



CITY OF NASHUA, NH

CONSOLIDATED PLAN

for

Community Development Block Grant and
HOME Investment Partnership Program

For the Five-Year Period July 1, 2010 – June 30, 2015

DRAFT REPORT

Donnalee Lozeau, Mayor
City of Nashua
City Hall, 229 Main Street
Nashua, NH 03060

April 26, 2010



3-5 Year Strategic Plan

This document includes Narrative Responses to specific questions that grantees of the Community Development Block Grant, HOME Investment Partnership, Housing Opportunities for People with AIDS and Emergency Shelter Grants Programs must respond to in order to be compliant with the Consolidated Planning Regulations.

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GENERAL

Executive Summary

The Executive Summary is required. Include the objectives and outcomes identified in the plan and an evaluation of past performance.

3-5 Year Strategic Plan Executive Summary:

The City of Nashua, NH's Five-Year Consolidated Plan identifies the community's affordable housing, community development and economic development needs and outlines a comprehensive and coordinated strategy for addressing them. It also serves as the application for funding to the U.S. Department of Housing and Community Development (HUD) for the Community Development Block Grant (CDBG) and HOME Investment Partnership (HOME) federal entitlement programs that serve low-income individuals and/or families. This Consolidated Plan covers the period beginning July 1, 2010 through June 30, 2015. Although the City is not an entitlement grantee under the McKinney Act, Emergency Shelter Grant (ESG) or Housing Opportunities for Persons with AIDS (HOPWA) programs, funds from these programs may be sought on a competitive basis, consistent with this Consolidated Plan.

The goals of the Consolidated Plan parallel those that HUD has established for jurisdictions across the country to pursue as part of their consolidated planning efforts:

CONSOLIDATED PLAN PRIORITY GOALS

GOAL I: DECENT, AFFORDABLE HOUSING: Provide decent, affordable housing for the community's lowest income households, including households with special needs.

GOAL II: EXPANDED ECONOMIC OPPORTUNITY: Create economic opportunities for residents and businesses in low income areas of the community.

GOAL III: SUITABLE LIVING ENVIRONMENT: Improve the living environment/quality of life in low-income neighborhoods.

The Consolidated Plan lead agency in Nashua is the Urban Programs Department (UPD) of the Community Development Division. This plan is the product of public outreach, public hearings and consultation with the Greater Nashua Continuum of Care, the Nashua Housing Authority, key City departments and over 100 agencies, groups, and organizations involved in the development of affordable housing, creation of job opportunities for low-income and moderate-income residents, and/or provision of services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons. A draft of this plan has been made available for public review and comment for a 30-day period beginning April 26, 2010. The availability of the draft plan and the final plan is advertised in the local newspaper and the complete documents are available for review on the City's website (www.gonashua.com) and in print form at the Community Development Division, the Nashua Public Library and the Office of the City Clerk. The Consolidated Plan is

intended to reflect community needs and to guide the use of CDBG, HOME and other federal resources to principally benefit low-moderate income individuals/families in Nashua over the next five years.

Funds Available

The priorities and accomplishment goals outlined in this document are based on assumptions about future funding levels for the Consolidated Plan programs. The City of Nashua used the average entitlement awards for the previous six years to estimate the funding of each program outlined below. Program income was estimated looking at previous year's data. However, during the past five years, there was a surge of loan re-payments through the Housing Improvement Program due to the housing "boom" which created a high rate of sold and refinanced properties. We do not expect this pattern to continue during the next five years. Because these programs are subject to annual Congressional appropriations as well as potential changes in funding distribution formulas or the number of communities eligible to receive entitlement grants, the accomplishment projections and planned activities are subject to change with availability of funding.

	Estimated Annual Entitlement	Five-Year Total Estimated Funds
CDBG	\$771,166	\$3,855,830
HOME	\$537,028	\$2,685,140
Estimated Annual Program Income	\$35,000	\$175,000
Totals	\$1,343,194	\$6,715,970

In addition to the funds detailed in the table above, the City of Nashua has been allocated \$198,273 of Community Development Block Grant – Recovery (CDBG-R) funds to support activities that create new jobs and other economic stimulus through the American Recovery and Reinvestment Act of 2009. These funds were allocated to specific projects FY2010, including micro-enterprise activities, Best Retail Practices and brownfields redevelopment. Additional ARRA funding was announced during the writing of this Plan. The New Hampshire Beacon Communities Project will receive \$10 million through to make residential, commercial, municipal, and industrial buildings in Berlin, Nashua, and Plymouth more energy efficient. The Beacon Communities funding will be used to support large-scale retrofits and make energy efficiency accessible to homeowners and businesses in Berlin, Nashua, and Plymouth. The project includes a statewide revolving loan fund to finance residential retrofits at favorable rates and public outreach efforts.

The City of Nashua also received \$1.9 million in Neighborhood Stabilization Program funds through the NH Community Development Finance Authority. The City is using these funds to support the redevelopment of multi-unit affordable residential properties in neighborhoods impacted by the foreclosure crisis.

Economic Development Initiative (EDI): The City of Nashua has received federal appropriations from the HUD-EDI program to implement future phases of the Nashua Riverwalk Project.

Brownfields Economic Development Initiative (BEDI): The City of Nashua was awarded \$2,000,000 to assist with cleanup activities related to the Nashua Millyard Boiler House.

Section 108: The City of Nashua was awarded \$2.85 million as part of its initiative to address cleanup and reuse of the Nashua Millyard Boiler House. Under the terms of the award, the fund are to be loaned to the City of Nashua and must be paired with the BEDI award. The City of Nashua has the authority to borrow as much as five-times its annual CDBG award, which would yield up to \$4,000,000 for community development investments in Nashua. For purposes of determining eligibility, the CDBG rules and requirements apply. As with the CDBG program, all projects and activities must either principally benefit low- and moderate-income persons, aid in the elimination or prevention of slums and blight, or meet urgent needs of the community.

Priorities, Goals and Objectives

A wide range of needs were identified through this participatory process. However, several consistent themes became apparent related primarily to employment, affordable housing, affordable healthcare/insurance and neighborhoods. Many of the goals are inter-related and can be achieved through a multi-pronged approach. Additionally, it became apparent through analysis of the data required to compile this Consolidated Plan that the City's residents would benefit from a designated Neighborhood Revitalization Strategy Area (NRSA). A jurisdiction that elects to develop a NRSA that includes the economic empowerment of low-moderate income individuals obtains greater flexibility in the use of CDBG funds in the NRSA. The priorities, goals and objectives for this plan are summarized in the table on the following page. Only high and medium priority objectives were included in this table.

GOAL A: STRENGTHENING NEIGHBORHOODS (32%)	
<u>Objectives</u>	PRIORITY
➤Increase home ownership in areas of low-moderate income (LMI) concentrations to increase income diversity	HIGH
➤Increase the supply of rental housing to meet needs of all income groups	HIGH
➤Enhance the character of existing neighborhoods and revitalize older ones	HIGH
➤Ensure safe, sanitary housing and prevent housing discrimination	MEDIUM
➤Improve the quality of existing housing stock	MEDIUM
➤Improve quality of life issues contributing to neighborhood blight	MEDIUM
GOAL B: IMPROVE ECONOMIC OPPORTUNITIES (18%)	
<u>Objectives</u>	
➤Improve the economic well being of Nashua's LMI individuals through job creation or retention	HIGH
➤Stimulate the growth of new enterprises, including microenterprises	HIGH
➤Enhance the vitality of neighborhood business districts and Downtown Nashua	HIGH
➤Reclaim brownfields and other abandoned and underutilized sites	MEDIUM
➤Enhance the job skills of Nashua's workforce, particularly LMI individuals	MEDIUM
GOAL C: IMPROVE THE QUALITY OF LOCAL INFRASTRUCTURE (20%)	
<u>Objectives</u>	
➤Improve the quality/increase the quantity of public improvements that benefit low-moderate income individuals	HIGH

- | | |
|--|--------|
| ➤Provide low-moderate income residents with accessible open space, from neighborhood playgrounds to large scale regional parks | HIGH |
| ➤Ensure neighborhoods have access to schools, community centers, and open space via sidewalks or trails | MEDIUM |

GOAL D: IMPROVE THE QUALITY OF COMMUNITY FACILITIES (15%)

Objectives

- | | |
|---|------|
| ➤Improve the quality/increase the quantity of facilities serving LMI individuals | HIGH |
| ➤Improve the quality/increase the quantity of facilities that benefit LMI teens and youth | HIGH |

GOAL E: IMPROVE THE QUALITY OF PUBLIC SERVICES (15%)

Objectives

- | | |
|---|------|
| ➤Improve services for all LMI individuals | HIGH |
| ➤Improve services for LMI youth and teens | HIGH |

DRAFT

**Summary of Specific Housing/Community Development Objectives
(Consistent with Table 1C)**

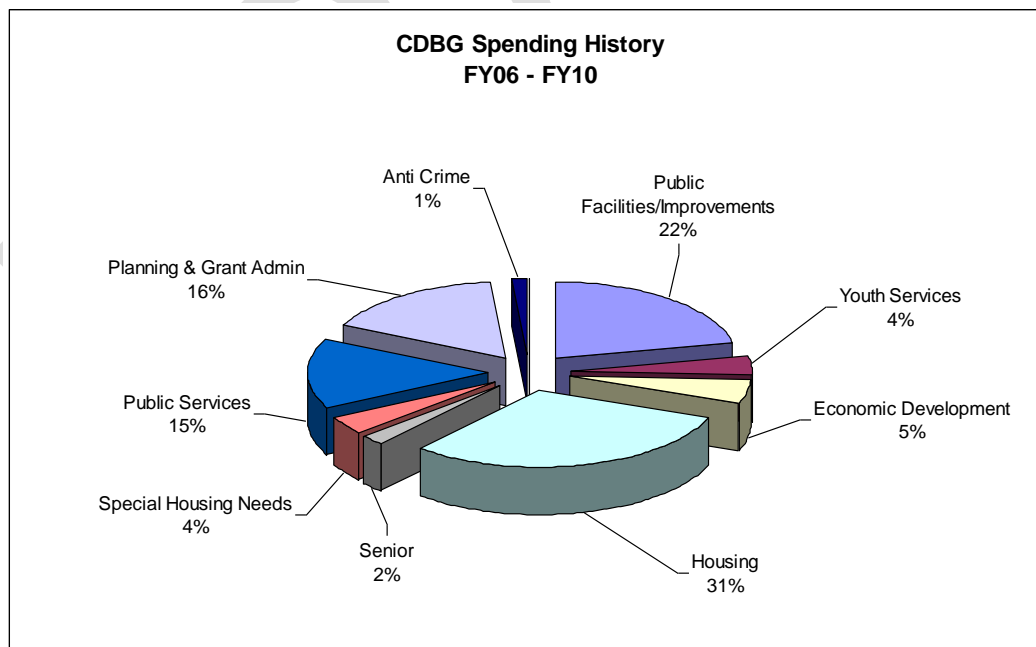
1 – Availability/Accessibility; 2 – Affordability; 3 – Sustainability

Obj #	Specific Objectives	Sources of Funds	Performance Indicators	Five-Year Goal
Decent Housing - DH				
DH-1.1	Increase the supply of rental housing to meet the needs of all low-moderate income (LMI) groups	HOME	# of affordable housing units created	50
DH-1.2	Ensure safe, sanitary housing and prevent housing discrimination	CDBG	# of families assisted	75
DH-1.3	Improve the quality of existing housing stock available to LMI households	CDBG	# of properties assisted through Nashua's Housing Improvement Program and/or energy efficiency retrofits	50
DH-2.1	Increase home ownership in areas of LMI concentrations to increase income diversity	CDBG, HOME	# of households who purchase a home as a result of receiving pre-purchase counseling or down payment assistance	50
Suitable Living Environment - SL				
SL-1.1	Improve the quality/increase the quantity of facilities that serve LMI individuals	CDBG	# of public facilities built or rehabilitated	25
SL-1.2	Improve the quality/increase the quantity of facilities that benefit LMI teens/youth	CDBG	# of public facilities dedicated to youth built or rehabilitated	20
SL-1.3	Improve services for all LMI individuals	CDBG	# of individuals served	25,000
SL-1.4	Improve services for LMI youth & teens	CDBG	# of youth participating in programs	10,000
SL-3.1	Enhance the character of existing neighborhoods and revitalize older ones	CDBG	# of neighborhood projects	3
SL-3.2	Improve quality of life issues contributing to neighborhood blight	CDBG	# of properties addressed on a spot basis	3
SL-3.3	Improve the quality/increase of public improvements that benefit LMI individuals	CDBG	# of infrastructure projects completed	5
SL-3.4	Provide LMI residents with accessible open space, from neighborhood playgrounds to large scale regional parks	CDBG	# of parks/green space projects completed	10
SL-3.5	Ensure neighborhoods have access to schools, community centers and open space via sidewalks or trails	CDBG	# of sidewalk, parking, trail, etc projects completed	5

Obj #	Specific Objectives	Sources of Funds	Performance Indicators	Five-Year Goal
Economic Opportunities - EO				
EO-1.1	Improve the economic well being of Nashua's LMI individuals through job creation & retention	CDBG, BEDI, Sec 108	# of jobs created or retained	60
EO-1.2	Stimulate the growth of new enterprises, including micro-enterprises	CDBG	# of businesses assisted	50
EO-1.3	Reclaim brownfields and other abandoned or underutilized sites	CDBG, BEDI, Sec 108, DOT	# of sites remediated or redeveloped	10
EO-1.4	Enhance job skills of LMI individuals	CDBG	# of individuals trained	150
EO-3.1	Enhance the vitality of neighborhood business districts and Downtown Nashua	CDBG, Private, City	# of improvement projects	5

Evaluation of Past Performance

The needs identified in the 2000 Consolidated Plan: Housing, Public Facilities, Infrastructure, Seniors, Youth, Economic Development, Anti-crime, Public Services and Planning were met over the past five years in a number of ways. The chart below shows the breakdown of CDBG resources dedicated to each need.



The HOME Investment Partnership Program requires a minimum of 15% be set-aside for affordable housing developed by a certified Community Housing Development Organization (CHDO). During the past five years, Neighborhood Housing Services of

Greater Nashua was the only CHDO certified by the City. Other existing certified CHDOs with-in the state are encouraged to apply to the City for designation, as HUD requires each entitlement to certify CHDOs individually. HOME program funds were allocated in the following manner over each of the five consolidated program years:

- 15% CHDO set-aside
- 5% CHDO operations
- 10% Administration
- 70% Affordable Housing Development

The table below shows the total CDBG and HOME funds received and spent during the five-year period covered by the previous Consolidated Plan (FY2006 – FY2010):

	FY06	FY07	FY08	FY09	FY10
CDBG	\$843,086	\$758,264	\$756,671	\$730,388	\$739,188
CDBG-R	-	-	-	-	\$198,273
HOME	\$554,021	\$521,315	\$517,633	\$505,768	\$563,317
Program					
Income	\$110,694	\$30,000	\$74,315	\$170,622	\$36,000*
TOTALS	\$1,507,801	\$1,309,579	\$1,348,619	\$1,406,778	\$1,546,778

*Approximate funds received as of April 1, 2010

Performance and Outcome Measurement

To facilitate the assessment of performance and the tracking of results nationally, HUD has adopted a uniform performance measurement system. This system will allow HUD to aggregate results across the broad spectrum of local programs funded by these block grants so that the impact of housing and community development programs can be measured at the national level.

HUD's performance measurement system combines three statutory objectives – to provide decent housing, to provide a suitable living environment, and to expand economic opportunities - with three outcome categories:

- **Availability/Accessibility:** This outcome category applies to activities that make services, infrastructure, public services, public facilities, housing, or shelter available or accessible to low-and moderate-income people, including persons with disabilities. In this category, accessibility does not refer only to physical barriers, but also to making the affordable basics of daily living available and accessible to low and moderate income people where they live.
- **Affordability:** This outcome category applies to activities that provide affordability in a variety of ways in the lives of low- and moderate-income people. It can include the creation or maintenance of affordable housing, basic infrastructure hook-ups, or services such as transportation or day care.
- **Sustainability: Promoting Livable or Viable Communities.** This outcome applies to projects where the activity or activities are aimed at improving communities or neighborhoods, helping to make them livable or viable by providing benefit to persons of low- and moderate-income or by removing or eliminating slums or blighted areas, through multiple activities or services that sustain communities or neighborhoods.

The City of Nashua has been utilizing logic models which incorporate outcome measures in program planning, project applications, and contracts since FY2007. The City has established goals and objectives for the Consolidated Plan period that address HUD's outcome statements.

Strategic Plan

Due every three, four, or five years (length of period is at the grantee's discretion) no less than 45 days prior to the start of the grantee's program year start date. HUD does not accept plans between August 15 and November 15.

Mission

The Community Development Division's (CDD) responsibility is to guide the City of Nashua and its citizens in the pursuit of a clear vision for its future and to provide the framework and mechanisms for the City and the private sector to implement that vision. As part of the CDD, the Urban Programs Department has a further commitment to: Assist the community in the identification of needs and strategies affecting individuals and neighborhoods of lower income; Form and participate in collaborations with community groups and investors; Competently obtain and administer federal, state, local and private resources directed to these needs; and Assess the effectiveness of outcomes.

Building upon the vision of the City's Master Plan, which includes:

Providing:

- Excellent educational, cultural, and recreational activities
- A clean and safe community with efficient, functional transportation
- Balanced housing growth that allows the City to provide services and assistance to residents

Promoting:

- A strong economic community
- Comprehensive long-range planning and regional cooperation
- Management of all our resources for the future

Fostering:

- An informed and active citizenry
- Integrity in city government
- Fair and equitable treatment for all citizens

The Consolidated Plan shall serve as a guide for the fund administrators and housing and community development constituencies. It shall simultaneously serve as a management tool for the U.S. Department of Housing and Urban Development against which accomplishments shall be measured.

General Questions

1. Describe the geographic areas of the jurisdiction (including areas of low income families and/or racial/minority concentration) in which assistance will be directed.

2. Describe the basis for allocating investments geographically within the jurisdiction (or within the EMSA for HOPWA) (91.215(a)(1)) and the basis for assigning the priority (including the relative priority, where required) given to each category of priority needs (91.215(a)(2)). Where appropriate, the jurisdiction should estimate the percentage of funds the jurisdiction plans to dedicate to target areas.

3. Identify any obstacles to meeting underserved needs (91.215(a)(3)).

3-5 Year Strategic Plan General Questions response:

1. Geographic Area Description

Known as the "Gate City", Nashua is the second largest municipality in New Hampshire. Nashua is one of several mill cities in the Merrimack River valley, including Manchester, NH, Lowell, MA and Lawrence, MA that evolved into regional centers, containing most of their regions' population, commerce, and industry. The exchange of commerce was fueled by waterways (rivers and canals) and then by railroads starting in the 1830's. In the period from the late 1800's to the early 1900's, Nashua's population grew steadily, from 13,397 in 1880 to 31,463 in 1930.

Today Nashua has many distinct neighborhoods, each with their own history and character.

Downtown Nashua

As an historic central business district, Downtown Nashua is the cultural, governmental, and iconic center of Nashua. While its importance as a regional shopping destination has declined in recent decades, it still remains an important mixed-use district, with shops, restaurants, upper story housing and service-oriented businesses. The focus of the district is Main Street, a five-lane road that runs north/south through Downtown.

Nashua Millyard / Front & Franklin Street Mill District

The City of Nashua was established in the early 19th century as major industrial center for textile manufacturing. Textile mills were constructed on the banks of the Nashua River—first on the south bank to the west of Downtown Nashua near Pine Street and Factory Street. Future mills were constructed on the north bank along Front, Franklin and Canal Streets. Use of the mills for manufacturing curtailed during the 20th century. Today, the mills are in various states of use, some converted to mixed-income housing, others hosting artist studios as well as businesses engaged in small-scale manufacturing, services and research and development. A substantial amount of the space in these mills sits vacant or is underutilized.

Crown Hill

The Crown Hill neighborhood sits west of Downtown Nashua. It is primarily a residential neighborhood populated with single and multi-family homes. The neighborhood is bounded by East Hollis Street to the north, the Merrimack River and the New Hampshire Main Line railroad to the east, Salmon Brook to the south and Harbor Ave to the east. The neighborhood experienced a devastating fire in 1930, which destroyed over 400 buildings in the neighborhood, mostly homes.

French Hill

Receiving its name due to a wave of French-Canadian immigrants, which settled near the mills on Canal Street in the late 18th and early 19th century, French Hill has always been a place where newcomers to the city could get their start in Nashua. Today, French Hill remains a dense neighborhood of single and multifamily homes located north and northwest of Downtown Nashua on the north side of the Nashua River. The neighborhood has traditionally been home to a significant concentration of low-and-moderate income residents and low rates of homeownership.

The neighborhood is bounded by Canal Street to the south (and the current mill complex occupied by one of the Nashua's largest employers, defense contractor BAE), the New Hampshire Main Line railroad to the east, Laton Street to the north and Orange Street to the west.

Tree Streets

The neighborhood located immediately west of Downtown Nashua contains streets named for trees, giving the neighborhood its name. The densely developed neighborhood contains a large percentage of old homes. The area is bounded by Elm Street to the east, the Millyard and the Nashua River to the north, Salmon Brook to the south and Pine Street to the west. Major east/west roadways bisect the neighborhood and include Ledge Street, West Hollis Street and Kinsley Street, all of which are used to connect Downtown Nashua with the F. E. Everett Turnpike.

For a long time, the neighborhood has been an area of transition. Like the French Hill neighborhood, it is one that has been a first stop for new immigrants in Nashua. Residents have traditionally sought employment in the city's industrial sector, initially in the mills located near Downtown but more recently within regional industrial parks and retail concentrations. The area has seen significant disinvestment in recent decades and has been home to concentrations of crime, poverty and home foreclosures. The area has among the lowest levels of homeownership in the City and the State of New Hampshire.

Amherst Street Corridor

The Downtown Nashua NSRA extends northwesterly from Downtown Nashua along Amherst Street, a busy roadway that connects Downtown Nashua and the F.E. Everett Turnpike. Neighborhood-focused commercial and service-oriented businesses line the road. Predominantly single-family homes populate the adjacent neighborhoods.

Library Hill

Library Hill is located north of Downtown Nashua at the intersection of Main Street, Amherst Street, Manchester Street and Lowell Street. The Hunt Building, the city's former library is located at this intersection and gives the area its name. The area is also home to churches, service-oriented businesses and large historic homes, many of which have been restored.

Other Areas

A significant residential area extends south and west of Downtown Nashua beyond the Tree Streets neighborhood out to the F. E. Everett Turnpike. This area is anchored by Ledge Street, West Hollis Street, Kinsley Street and Lake Street, which all run east/west from Downtown to the Turnpike. The area is highlighted

by single family homes surrounding the Fairgrounds school complex, concentrations of duplexes and multifamily homes and Saint Joseph Hospital, one of Nashua's largest employers.

The City has consistently strived for distribution of CDBG funds to especially needy neighborhoods, which are usually defined by HUD as those areas with high concentrations of low and moderate income residents and those areas which have a disproportionate minority population in need. In this respect it has been successful.

Significant concentrations of low and moderate income persons and/or racial concentrations, provide pertinent information when decisions are made of where CDBG resources might be focused. De-concentration of poverty and race is a Congressional objective and under HUD regulations it affects the site selection of new housing. It also defines how some CDBG uses may be approved under what is termed an 'area benefit'. Under this designation, it is presumed that activities funded with CDBG would primarily benefit low income persons, if they are implemented in a defined area with a low-moderate income population of 51% or greater.

As can be seen from the table below, the concentration of poverty in Nashua has remained constant through 2008. The minority population has grown by over forty percent during the past nine years. Although it is common to base funding decisions on Census 2000 data, in most cases that data does not accurately reflect current conditions. Throughout this Plan we have used acceptable sources, when available, to more accurately portray the City.

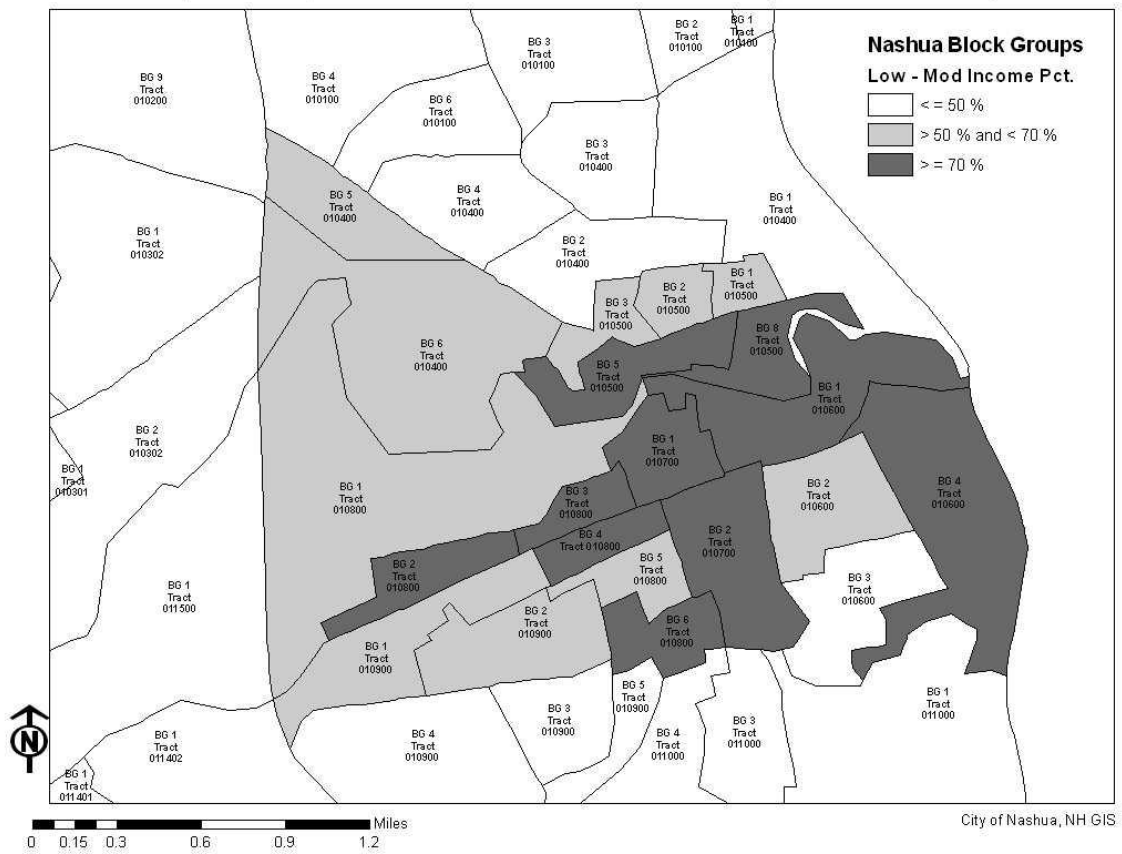
Poverty and Racial Concentrations

% Poverty Families Census 2000	% Poverty Families ACS 2008¹	% Minority 2000 Census	% Minority 2008 ACS Estimate	% Minority 2009 ESRI Estimate
6.76%	6.36%	10.81%	14.20%	14.86%

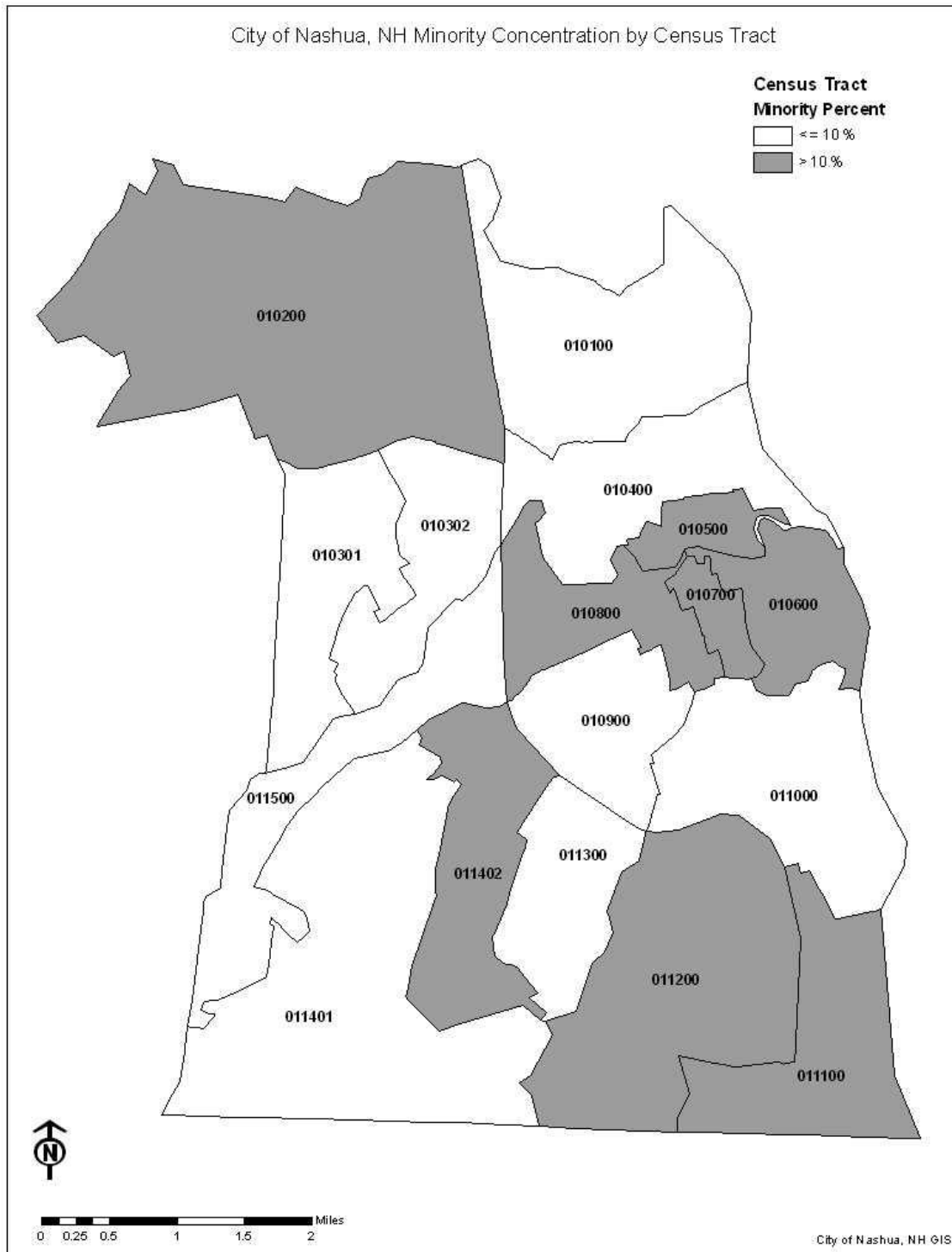
Source: US Census 2000 SF3, American Community Survey 2008, ESRI forecasts for 2009 and 2014

Based on 2009 HUD and US Census data, there are a total of 20 Census blocks where greater than 50% of the population is low-moderate income. Of those 20, half have very high concentrations of low-moderate income populations (greater than 70%). The map below show areas of low and moderate income concentrations. The City prefers to view low-moderate income population data by Census block in order to better understand where the true concentrations of low-moderate income populations exist. There are four Census tracts with overall concentrations of low-moderate income individuals, versus 20 Census blocks. Any area where greater than 50% of the population is low-moderate income is eligible for area benefit designation of CDBG funds. There may be instances where the activity is not in a low-moderate income Census tract, but is in a low-moderate income Census block. The distinction between this data very important.

City of Nashua, NH Low-Moderate Income Concentration by Census Block Groups



The following map and table shows the census tracts in terms of racial concentration based on ESRI 2009 data. Eight census tracts in Nashua have a minority concentration of more than 10% and two census tracts are over 30% minority. Note that the top four census tracts in terms of low-mod population (010800, 010700, 010600 and 010500) are also among the census tracts with the highest minority concentration.



Nashua Minority Concentration by Census Tract

Nashua Census Tract	% Minority 2009 Estimate
011100	31.8%
010800	30.9%
010200	19.7%
011402	18.1%
010700	17.1%
010500	16.9%
011200	15.9%
010600	15.5%
010302	9.7%
010900	9.6%
011401	7.8%
010400	7.7%
010100	7.0%
010301	7.2%
011300	6.6%
011000	6.4%
011500	4.4%

2. Basis for Geographic Allocation

The primary objectives of the Consolidated Plan programs are to benefit low-income and moderate-income residents. The resources covered by this Plan will be directed to those areas of the City where the highest concentrations of low-moderate income individuals reside. The proposed NRSA sets a high priority for the City to target activities to benefit this area. The NRSA plan describes the boundaries of the area based on Census blocks; however it generally covers Census Tracts 104-108.

Although the "inner city" has the highest concentrations of low-moderate income individuals, priority objectives may take place in any area that benefits low-moderate income individuals. According to HUD regulations, an area need not be coterminous with census tracts or other officially recognized boundaries but must be the entire area served by the activity.

The City envisions continuing targeting a substantial portion of its CDBG resources to those neighborhoods found within Nashua's low/moderate income census tracts, thus maximizing the benefits CDBG funds may produce within these neighborhood settings. However, while many of the areas being targeted are also CDBG defined area benefit neighborhoods, the City does not plan to use that technical eligibility criterion.

The public facilities and improvements projects that will receive funding meet eligibility criteria by providing services that benefit low and moderate-income persons living throughout the community. Many of the proposed improvements are designed specifically to accommodate and provide accessibility to the physically disabled.

3. Obstacles to Meeting Underserved Needs

The primary obstacle to meeting all of the identified needs, including those identified as priorities, is the general lack of funding available to the public and private agencies who serve the needs of low and moderate-income residents. In recent years, the State of New Hampshire has reduced funding for local aid to cities and towns, housing, community development, social services, education, homeless services, economic development, recreation, and public health programs in an attempt to counter the effects of stagnant tax collections, escalating health insurance obligations, and rising costs of service delivery. Many private foundations which have historically aided municipalities and not-for-profit organizations dedicated to addressing Consolidated Plan needs have seen their endowments substantially reduced by declines in the stock market in the last several years. As a result, the major foundations serving the Nashua area have all reduced their giving in recent years. The City of Nashua's municipal budget has been stretched to overcome the substantial reduction in local aid from the State of New Hampshire. Coupled with increasing health insurance and service delivery costs, these current levels have City department setting budgets with zero increases. Often this results in the need to reduce staff levels in order to meet contractual annual salary increases. This leaves little room for expansion of community development funding at the local level.

Except for special populations unable to work (some elderly, most extra elderly, some disabled and those institutionalized), the critical need is jobs. When working with service agencies to develop this plan, many of them noted that a shift in the characteristics of clients had occurred. In the past, many of the clients had no employment or sporadic employment histories. Currently people who previously had regular and long term employment are seeking help.

Finally, the City of Nashua's Consolidated Plan entitlement grant amounts have fluctuated in the past five years and in some cases not kept up with inflation. This makes it difficult to predict the amount of funds available from year to year and further limits availability of funds to address the needs in the community.

Managing the Process (91.200 (b))

1. Lead Agency. Identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.
2. Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.
3. Describe the jurisdiction's consultations with housing, social service agencies, and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.

*Note: HOPWA grantees must consult broadly to develop a metropolitan-wide strategy and other jurisdictions must assist in the preparation of the HOPWA submission.

3-5 Year Strategic Plan Managing the Process response:

1. Lead Agency

The City of Nashua's Urban Programs Department (UPD) within the Community Development Division is the lead agency responsible for the development of this Consolidated Plan. The UPD manages the HOME, CDBG and housing rehabilitation programs for the City, including management of sub-recipients carrying out activities funded by these programs. The lead legislative body is the Human Affairs Committee of the Nashua Board of Aldermen. The Committee holds the public hearings for the Consolidated Plan, Annual Action Plan, Consolidated Annual Performance Evaluation Report (CAPER) and any other hearings required for federal programs. The Committee deliberates the annual applications for funding under the CDBG program and makes the recommendations to the Board of Aldermen. Many other agencies are involved in the administration of programs covered under the Plan. They may include:

City of Nashua: Public Works Division, Police Department, Nashua Fire Rescue, Office of Economic Development, Division of Public Health and Community Services and Welfare Department

Other Public Agencies/Organizations: Greater Nashua Continuum of Care and Nashua Housing Authority

Private Agencies/Organizations: Big Brother/Big Sister, Boys and Girls Club, Bridges, Dental Connections, Greater Nashua Council on Alcoholism, Girls Incorporated, Greater Nashua Habitat for Humanity, Harbor Homes, Marguerite's Place, Nashua Children's Home, Nashua Pastoral Care Center, Nashua Soup Kitchen, Neighborhood Housing Services of Greater Nashua, New Hampshire Legal Assistance, PLUS Company, Salvation Army, Southern New Hampshire Services, Tolles Street Mission, The Upper Room and others.

2. Plan Development Process

This Plan was developed through the collaborative effort of City departments, nonprofit agencies, religious institutions, the Greater Nashua Continuum of Care, the Nashua Housing Authority, citizens, local businesses and other interested parties. Special attention was paid to ensure low-moderate income individuals, minority groups, those directly impacted by the Plan and the agencies who service these individuals were included. In addition to direct consultations, described in further detail under Consultations below, the UPD took advantage of the many surveys, studies and public opinion forums already conducted. Descriptions of these sources used to develop the plan follow:

MASTER PLAN 2000

The City of Nashua has based the development of its five-year Consolidated Plan on the City's Master Plan. The Master Plan, which was adopted in 2000, serves as the planning guide for the City as it prepares for Nashua's future. The overall goal of the Master Plan states that "Every effort will be made to make Nashua a desirable place to live". The overall vision of the Master Plan is stated in the Mission statement above. Although the Master Plan was adopted in 2000, the goals are still relevant and related to the goals within this Consolidated Plan:

Housing goals:

- Ensure safe, sanitary housing and prevent housing discrimination
- Provide a range of housing types and densities for current and future population, including diverse age and income groups

- Increase supply of rental housing to meet needs of all income groups
- Protect character of existing neighborhoods and revitalize older ones, particularly in the downtown
- Support expanded home ownership opportunities in the inner city

Conservation and Preservation Goals:

- Balance recreational needs with protection of fragile resource areas
- Promote public access to and protection of Nashua's extensive river corridors
- Preserve and protect additional open space areas
- Provide all City residents with accessible open space, from neighborhood playgrounds to large-scale, regional parks
- Restore the City's historic connection with the Nashua River and other historic, cultural, educational, and recreational sites
- Develop a watershed management plan for the City's major watersheds

Economic Development Goals:

- Attract select international and out-of-state growth businesses, and promote expansion of existing businesses
- Promote the stability and aesthetic quality of the City's commercial areas
- Encourage new industries and businesses that incorporate the principles of environmental sustainability
- Take actions to facilitate the airport's long-term viability
- Continue efforts to ensure that Downtown continues as the community's premier cultural, social, recreational, and economic center
- Guide commercial and industrial development to the existing built environment

Transportation Goals:

- Invest in non-vehicular systems: bus transit, bicycle and pedestrian facilities, and regional rail
- Ensure each neighborhood has access to schools, community centers, and open space via sidewalks or trails
- Consider transportation linkages with the region and State when undertaking transportation planning
- Develop and implement City-wide traffic plan that discourages through-traffic in residential areas
- Construct the Broad Street Parkway to alleviate traffic congestion in the downtown and improve access to economic development sites
- Consider instituting half-hour headways for bus service if feasible, and provide pedestrian amenities

- Ensure adequate on- and off-site traffic circulation at commercial development sites

Community Facilities, Utilities and Public Services Goals:

- Ensure that Health & Community Services, Fire Safety, and Police facilities are adequate to meet demand
- Conduct a Fire Safety Needs Assessment
- Optimize use of Nashua Community Policing neighborhood offices, and add new ones if necessary
- Develop new telecommunications infrastructure
- Consider implementing new solid waste management technologies
- Promote coordinated infrastructure improvements between diverse public safety, utility, and public service providers
- Ensure superior water quality and service that meets the needs of residents, businesses and industries in the City

Growth and Development Goals:

- Explore opportunities to provide neighborhoods with accessible support services such as: retail, employment, medical services, and recreation
- Encourage investment in and restoration of downtown Nashua
- Encourage pedestrian-oriented, mixed-use neighborhoods in new subdivisions and residential sites
- Preserve marketable industrial sites
- Identify land for housing at various densities to meet diverse lifestyle needs
- Encourage the development community and financial institutions to support infill development, including Brownfield sites

At each step in the preparation of the Consolidated Plan, care has been taken to develop programs and services to ensure that Nashua is a desirable place for all Nashua residents, particularly low and moderate income residents.

UNITED WAY 2009 COMMUNITY ASSESSMENT

The United Way conducted an assessment to document and evaluate the health and well being of residents living in the Greater Nashua area. The techniques used to gather information included a household survey posed to 500 area residents, a Human Services Agency survey completed by 61 agencies, and five focus groups. The detailed results of the surveys and focus groups were used, in part, to prioritize the needs identified in the Consolidated Plan.

The overriding concern in the community is affordable medical/health care. Unemployment and job security were major issues, including finding a job with medical benefits.

Meeting basic needs is a community-wide concern. Affordable housing and poverty were cited as major concerns in the Greater Nashua area. Families that cannot afford to own a home are increasing the demand for rental properties resulting in higher rents. For low income families, the wait for subsidized housing is several years. The

recent economic downturn has greatly impacted the health and well being of many Nashua residents, especially low and moderate income individuals. The needs of Nashua residents are great and the goals of the Consolidated Plan assist in addressing these needs. The top three needs identified by each category surveyed are listed in the chart below. The agencies clearly rated issues much higher than the households.

Household Survey - Community Issue	Rank	Household Survey- Family Issue	Rank	Provider Survey - Community Issue	Rank
Affordable medical insurance	51%	Affordable medical insurance	20%	Affordable Housing	92%
Affordable Housing	46%	Affordable medical care	18%	Affordable medical insurance	89%
Affordable medical care	45%	Affordable dental insurance	18%	Affordable dental insurance	84%

2010 NEIGHBORHOOD SURVEY

The five year Consolidated Plan allows the City of Nashua to set priorities for its federal funds based on the needs of its citizens. The 2010 Neighborhood Survey was designed by the UPD to examine issues faced by residents in the Tree Street Neighborhood of Nashua—an area historically populated by a large percentage of low and moderate income individuals as evidenced by Census data. The survey objective was to ascertain resident views on several important issues, including housing, economic development, health care, crime, youth education, and their neighborhood. A similar survey was conducted in 2007. This area was selected as a focus group so that UPD could compare and contrast the change over the last three years.

Bi-lingual volunteers from the AmeriCorps VISTA program conducted door-to-door surveys in the Tree Street Neighborhood. The geographic boundaries of this neighborhood include two sections described as:

1. East - Main Street, North - Central Street, West - Pine Street, South - Lake Street; and
2. East - Pine Street, North - Ledge Street, West - Houde Street, South - Kinsley Street.

The survey was also made available on line to any resident of the City. The surveys were collected from February 1, 2010 to March 31, 2010. Of 228 surveys completed, 55 were completed on line.

Below is the summary of results, placed in order of the "Significant Problem" issues that were ranked highest. The top three issues identified were economic development related. This is no surprise given the state of the economy and the high unemployment rates. It is also interesting to note that there were many issues the residents felt were not a problem at all, including: public transportation, public education, public safety, affordable housing, lead paint and education for non-English speaking adults. Generally, most resident answers were split between "Somewhat of a Problem" and "Not a Problem".

Topic	Significant Problem	Somewhat of a Problem	Not a Problem
1. Finding a job w/ benefits	43%	34%	23%
2. Finding a good job	40%	36%	24%
3. Unemployment/full time work	37%	36%	27%
4. Speeding	26%	47%	27%
5. Community events	21%	27%	53%
6. Parking	20%	36%	44%
7. Home ownership attainability	20%	34%	46%
8. Sale of illegal drugs	19%	31%	51%
9. Access to affordable health care	18%	44%	38%
10. Having enough money to meet everyday expenses	17%	48%	35%
11. Rundown properties	16%	47%	37%
12. Roads & sidewalks	14%	53%	34%
13. Homelessness	14%	21%	75%
14. Affordable medications	13%	45%	42%
15. Alcohol/drug abuse	13%	41%	47%
16. Vandalism	13%	39%	49%
17. Crimes committed by youth	13%	39%	49%
18. Alcohol/drug treatment assistance	13%	34%	53%
19. Parks & open spaces	12%	34%	53%
20. Violent crimes	11%	39%	50%
21. Vacant properties	9%	44%	46%
22. Programs for youth	9%	39%	52%
23. Mental illness	9%	36%	50%
24. Gangs	9%	32%	59%
25. Affordable quality child care	8%	44%	47%
26. Public transportation	8%	24%	68%
27. Affordable housing	7%	34%	59%
28. Public safety/police protection	6%	27%	68%
29. Public Education	6%	21%	73%
30. Ed. for non-English speaking individuals	5%	32%	63%
31. Lead paint	4%	20%	75%
32. Overall physical condition of neighborhood	3%	53%	43%
33. Safe & decent housing	3%	34%	62%
34. Inoperable cars	3%	31%	66%
35. Access to shopping	3%	14%	83%

DOWNTOWN NASHUA MARKET ANALYSIS: CONSUMER & BUSINESS SURVEY

Background

Economic restructuring is a continuous process involving a large number of downtown constituents. Downtown retention, expansion, and recruitment efforts require addressing the needs of business operators, property owners, customers, and residents. It also involves educating and building the capacity of these stakeholders, as well as policy makers and economic development organizations. Downtown Nashua is located within a predominately low and moderate income area.

The goal is to create an environment where residents, particularly low and moderate income individuals, can participate in and benefit from a strong and vibrant local economy. Job opportunities are created by strengthening neighborhood businesses. Many Downtown Nashua retail businesses and restaurants provide jobs for low and moderate income individuals. Given these objectives, the Downtown Nashua Consumer Survey and Business Survey were designed to examine information on issues facing downtown businesses, the evolving nature of regional competition, and consumer/resident needs and preferences. This information will be used by the City of Nashua to develop programs and initiatives to overcome barriers to business success. Excerpts from the survey are below:

Consumer Survey Research Objectives

- Ascertain which consumer groups go or use Downtown Nashua the most
- Determine their preferences, likes, and dislikes
- Find out if their needs and wants are being met
- Discover opportunities for Downtown businesses to serve these consumers more effectively and expand their customer base
- Understand how downtown businesses and building owners can improve their capture of the market
- Determine which promotional methods are most effective
- Determine the physical aspects of the Downtown that should be improved

Consumer Impressions of Downtown

Respondents were asked which community assets they would most like to see developed:

- 7 out of 10 respondents would most like to see a commuter rail station developed in Downtown Nashua (71.8%)
- Almost half of the respondents (47%) would like to see a walking trail developed
- The need for additional public parking facilities was cited by 42% percent
- 40% of respondents would like to see a performing arts center in Downtown Nashua
- 36% would like to see a bike trail

Business Survey Research Objectives

- Analyze the Downtown Nashua economy—an area predominately inhabited by low and moderate income individuals as evidenced by Census data.
- Understand the issues that current business owners face.
- Compare business owner and consumer perceptions.
- Gather information to:
 - Strengthen local businesses by determining issues hampering their growth and job creation potential
 - Determine strategies to help businesses overcome these issues
 - Develop programs that support the efforts of Downtown Nashua merchants

Business Impressions of Downtown

- Over ½ of the respondents would most like to see a commuter rail station developed in Downtown Nashua (57%)
- Over 1/2 of the respondents (56%) would like to see a performing arts center developed
- Forty-five percent of survey respondents would like to see expanded green space

Technical Assistance Needed

Respondents were asked about their technical assistance needs. Businesses clearly feel the need for assistance in numerous areas.

- Over ½ of the respondents would like assistance with advertising and marketing
- Over 1/3 of the respondents would like assistance with internet or e-commerce (38%) and business market analysis (36%)
- Building improvement assistance was cited by 32% of the respondents
- Business planning was a concern for almost a ¼ of the respondents
- Window displays or interior store design assistance was cited by 23%
- Financial management assistance is needed by 21%

Usefulness of Existing Products and Services

Respondents were asked about the usefulness of existing products and services offered by the City of Nashua Economic Development Office and other Downtown organizations.

- Over ½ of the respondents cited the following as useful: Downtown public improvement projects, Downtown directories, brochures and maps, information sharing, and special event coordination
- Almost fifty percent of the respondents find the following useful: web site or internet resources, marketing Downtown as a shopping destination, and networking events
- Façade grants, retail event coordination, and cooperative advertising coordination were cited as useful by over a 1/3 of the respondents

3. Consultations

The UPD consulted directly with the Greater Nashua Continuum of Care, nonprofit and social service agencies, the Nashua Housing Authority, The New Hampshire Housing Finance Authority, public agencies and City departments regarding the priorities and needs addressed in this Plan. These consultations transpired through questionnaires, interviews and discussions groups. Results of these consultations are more fully described in the section above. Details of the inter-departmental and Continuum of Care sessions held are below.

Drafts of the Plan were sent to the NH Community Development Finance Authority, the NH Housing Finance Authority and the Nashua Regional Planning Commission.

INTER-DEPARTMENTAL COLLABORATIVE SESSION

On February 3, 2010 the UPD held an Inter-Departmental Collaborative Session. The purpose of the Session was to provide the opportunity for key departments to contribute critical information from their perspectives, based on the area of service

they provide. Managers from the following departments participated: Police Department; School Department; Code Enforcement; Division of Public Health and Community Services; Welfare Department; Division of Public Works; Economic Development; Financial Services Division; Urban Programs Department; Transportation Department; and Community Development Division. The purpose of the Consolidated Plan was explained and the importance to integrate Department plans into the Five-year Consolidated Plan. Limited funding available under CDBG, HOME and related programs required the Department directors to prioritize their needs.

The discussion at the Inter-Departmental Session included five general categories: crime and youth education, economic development, healthcare, housing, and neighborhoods. The current economic situation in the United States today affects every Nashua resident. The consensus of the City representatives was that community's most pressing needs were economic development related. The group stressed the need for good jobs (decent pay, benefits), youth programs and neighborhood character building.

The City of Nashua strives to create an environment where residents, particularly low and moderate income individuals, can participate in and benefit from a strong and vibrant local economy. Job opportunities are created by strengthening businesses, including microenterprises. To help existing businesses and to attract new businesses, the City must invest in its infrastructure. Efforts must also include the enhancement of neighborhood business districts and Downtown Nashua.

Participants also felt youth programs, specifically for teens, are a priority. After-school programs for teens are limited and need to be expanded in order to occupy their free time in a valuable and productive way. Youth in general were identified as a group most vulnerable to the current tough economic times. The School Department stated there are currently 130 homeless children enrolled in the school system. Hunger amongst children has also become more of a problem in the past couple years, evidenced by some children harboring their free lunches to bring home for evening meals.

The objectives in the Consolidated Plan support the priorities outlined at the Inter-Departmental Collaborative Session.

CONTINUUM OF CARE CONSULTATION SESSION

On March 30, 2010 the UPD held a consultation session with the Greater Nashua Continuum of Care (GNCOC). The purpose of the session was to provide the opportunity for GNCOC members to help the City identify community needs, especially as they relate to homelessness. A total of 13 members attended from the following agencies: Neighborhood Housing Services of Greater Nashua, Southern NH HIV/AIDS Taskforce, Marguerite's Place, MP Housing, Nashua Children's Home, Greater Nashua Mental Health Center, Nashua Soup Kitchen and Shelter, Nashua Housing Authority, NH Charitable Foundation, Harbor Homes and Nashua Pastoral Care Center. A summary of the topics which were discussed at length follows.

The discussion included five general categories: crime and youth education, economic development, healthcare, housing, and neighborhoods. Participants were asked to identify which activities in the categories above are done well in the City and which need to be improved. The topic of neighborhoods generated much discussion. Some of the needs identified included parking issues, density issues, trash/litter, the lack of

community events, green space bike paths and many more. They noted the "Safe Routes to School" and redevelopment of certain properties as strengths to build upon.

Participants also identified health care and medical issues as a strong priority. There are many uninsured or under insured individuals facing medical challenges. The cost of prescription drugs and co-payments has risen significantly in recent years. The group felt there is a significant unmet need for mentally ill and drug/alcohol treatment and lack of dental care. The group noted several strengths, such as two full-service hospitals that offer financial assistance and collaborate with area non-profits, the work of the non-profits and the American Recovery and Reinvestment Act (ARRA) supplementing COBRA insurance. However, the need to extend the ARRA supplementation was noted.

Of the other topics, youth, crime, economic development and housing each category had many strengths and weaknesses identified. Youth issues included drug use, lack of supervision, jobs, and food/hunger and truancy. Strengths included: good schools/programs, student run food pantry at high school, Nashua Public Library, Family Resource Center and Nashua Parks & Recreations programs. Crime strengths: low state-wide crime rates, strong court diversion program, active crime watch groups. Crime issues: gangs, bullying, unemployment, domestic violence, internet crimes. The relationship of economic development to many of the community-wide issues was noted. The group felt that by creating a strong economic environment, that includes good paying jobs with benefits, affordable daycare, skills training and strong public transit system, residents would be able to better lift themselves out of poverty. Housing needs identified included holding landlords accountable (absentee landlords), need for more Section 8 vouchers and other subsidies, incentives for good landlords, emergency rental funds and homebuyer assistance. Strengths included housing for persons with HIV/AIDs, veterans, single mothers with children and elderly. The GNCOC advocates maximizing the proportion of CDBG dollars spent on housing production, especially for the population at risk of becoming homeless.

Citizen Participation (91.200 (b))

1. Provide a summary of the citizen participation process.
2. Provide a summary of citizen comments or views on the plan.
3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.
4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.

*Please note that Citizen Comments and Responses may be included as additional files within the CPMP Tool.

3-5 Year Strategic Plan Citizen Participation response:

1. Citizen Participation Plan

Many of the items discussed in the Plan Development and Consultations sections above detail the citizen participation process followed to prepare this Plan. The City

utilized technology to access citizens. It was our intent to reduce the burden of attending on-site collaborative sessions. Historically, these sessions lasted many hours requiring participants to either take time out of work or take time out of their evenings, which often created child care issues. It was our hope to access those citizens who do not normally attend collaborative sessions or public hearings.

The website SurveyMonkey® was used to consult with the service agencies of the community and for the resident survey. In addition to the online resident survey, AmeriCorps VISTA volunteers conducted a door-door survey in English and Spanish. In total approximately 250 resident responses were received and 30 agency responses. The surveys were available for four-six weeks and was posted on the City's website, the local access channel, e-mailed directly and mentioned at public Human Affairs Committee meetings.

A public hearing was conducted by the Human Affairs Committee on January 25, 2010 for the purpose of receiving public comment on past performance and future needs related to CDBG. The notice of the public hearing was published in the Nashua Telegraph on January 1, 2010.

The UPD offered a technical assistance workshop for agencies interested in submitting applications for FY2010 CDBG funding on January 21, 2010. At the workshop we reviewed the application, the funding process and requirements that would follow if they were to be funded. The UPD provided guidance and answered specific questions asked by the five agencies who attended.

On March 31, 2010 the UPD held a session with the Greater Nashua Continuum of Care (GNCOC) at Nashua City Hall to seek their input on setting the priorities and identifying the critical issues facing Nashua's low and moderate income residents. Notice of the meeting was sent to all members of the GNCOC via e-mail and was posted as a public meeting on the City's website.

The Citizen Participation Plan, provided as an attachment to this document, was revised and updated to reflect HUD requirements. It was released with this Consolidated Plan and available for public comment for 30-days starting April 26, 2010 at Nashua City Hall, City Clerk's Office and Division of Community Development and the Nashua Public Library. All activities were consistent with the existing and revised Citizen Participation Plan.

A public hearing was held on May 3, 2010 by the Human Affairs Committee for the purpose of receiving public comment on the Drafts of the 2010 Consolidated Plan, Citizen Participation Plan, Annual Action Plan and Neighborhood Revitalization Strategy Area Plan.

2. Citizen Comments

Citizens comments will be added following the public comment period.

3. Efforts to Broaden Citizen Participation

The citizen participation activities discussed above were conducted in an effort to outreach to minorities and non-English speaking persons, as well as persons with disabilities. The resident survey was conducted orally and availability written in Spanish and English in an area where there is a high Hispanic population. Persons with limited mobility could access the survey online. Ongoing efforts are detailed in our Citizen Participation Plan.

4. Comments Not Accepted

The City anticipates accepting all formal comments.

Institutional Structure (91.215 (i))

1.Explain the institutional structure through which the jurisdiction will carry out its consolidated plan, including private industry, non-profit organizations, and public institutions.

2.Assess the strengths and gaps in the delivery system.

3.Assess the strengths and gaps in the delivery system for public housing, including a description of the organizational relationship between the jurisdiction and the public housing agency, including the appointing authority for the commissioners or board of housing agency, relationship regarding hiring, contracting and procurement; provision of services funded by the jurisdiction; review by the jurisdiction of proposed capital improvements as well as proposed development, demolition or disposition of public housing developments.

3-5 Year Strategic Plan Institutional Structure response:

1. Institutional Structure

The City of Nashua's Urban Programs Department (UPD) is the lead administrative agency for the Consolidated Plan programs. The UPD provides fiscal and regulatory oversight of all CDBG and HOME funding sources as well as other Federal and State grants for housing, economic, and community development. The Board of Aldermen acts as the authority for the appropriation of funds for Annual Action Plan activities under the Consolidated Plan grant programs.

Consolidated Plan activities will be completed and managed by a diverse team of public, private, not-for-profit, and financial partners. The lists below identify some of the principal partners for each priority funding area. While not all the organizations listed below may receive Consolidated Plan funds directly, they are key partners in programs that support Consolidated Plan goals. Conversely, the absence of an agency from the list does not preclude them from funding. As of late, community financial institutions have also become strong partners.

City and Public Agencies

City of Nashua, Building Department	City of Nashua, Division of Health & Community Services
City of Nashua, Code Enforcement Department	Nashua Housing Authority
City of Nashua, Office of Economic Development	NH Community Development Finance Authority
City of Nashua, Planning Department	NH Housing Finance Authority
City of Nashua, Welfare Department	State of NH Division of Mental Health Services

Non-Profit Organizations

Bridges	Nashua Police Athletic League
Adult Learning Center	Nashua Red Cross
Community Council of Nashua	Nashua Soup Kitchen & Shelter
Gateways Community Services	Neighborhood Housing Services of Greater Nashua
Greater Nashua Council on Alcoholism	New Hampshire Legal Assistance
Greater Nashua Habitat for Humanity	PLUS Company
Harbor Homes, Inc.	Salvation Army
Lamprey Health Center	Southern NH HIV/AIDS Task Force
Marguerite's Place	Southern NH Services
MP Housing	The Upper Room
Nashua Children's Home	Tolles Street Mission

2. Strengths and Gaps of Institutional Structure

Both strengths and gaps are attributed to the institutional structure.

Strengths

1. Involvement of private sector in financing affordable housing
2. A full-service housing authority
3. Capacity for housing rehabilitation
4. Municipal planning and building code staff
5. Emergency shelter network
6. Community support of nonprofit organizations
7. Housing experience of nonprofits serving special needs clients;
8. A highly participative resident community that serves on boards of nonprofits

Gaps

1. Development of mixed income housing & neighborhood opportunities
2. Focus needed on providing decent employment to LMI individuals to earn a livable wage, so as to afford housing
3. Lack of cohesive understanding by all community partners of real needs

3. Strengths and Gaps in the Delivery System for Public Housing

The Nashua Housing Authority (NHA) is a public body consisting of a five member Board of Commissioners. Organizationally, the Authority is separate and distinct from the City of Nashua in that it does not fall within the City's existing governmental structure. NHA Board members are appointed by the Mayor of the City of Nashua. The U. S. Department of Housing and Urban Development requires public housing authorities to have not less than one eligible resident serving on its governing board. In terms of relationships regarding hiring, contracting and procurement, the Nashua Housing Authority undertakes and completes the aforementioned items through its Executive Director and administrative staff, independently of the City of Nashua. Nonetheless, the NHA must adhere to hiring practices required by the federal Department of Housing and Urban Development. Contracting and procurement activities are governed by New Hampshire Law.

Residents of public and assisted housing are entitled to the use and benefit of services provided and funded by the City of Nashua in much the same way as all residents of the City of Nashua are entitled to the use and benefit of City services. Additionally, the Nashua Housing Authority is eligible to apply to the City of Nashua for funding provided by the City's Community Development Block Grant and HOME Program funds. The City of Nashua has some input in the review of procedures for proposed sites for development of public or assisted housing. Major development proposals are also subject to the applicable review by City of Nashua Boards and Commissions, including the Planning Board, Conservation Commission, and Zoning Board of Appeals.

As part of the Quality Housing and Work Responsibility Act of 1998, all housing authorities are required to develop a Comprehensive Five Year Plan and submit it to HUD for approval. Said Plan must be approved by the City of Nashua prior to submission to HUD. Therefore, the City of Nashua does have a built in mechanism for review of the Nashua Housing Authority's planned activities over a five-year period. The content of the NHA's five-year plan is coordinated with the content of this Consolidated Plan. In terms of proposed demolition and/or disposition of NHA owned public housing, HUD requires that, prior to demolition/disposition, the City of Nashua must approve in writing said demolition/disposition. Consequently, the City of Nashua has a built in review and approval process for proposed NHA demolition/disposition activities.

Monitoring (91.230)

- Describe the standards and procedures the jurisdiction will use to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.

3-5 Year Strategic Plan Monitoring response:

Overview

The City of Nashua recognizes monitoring of CDBG, HOME, and CDBG-R as an important component in the administration of HUD funds. An internal management plan is in place to ensure the proper and timely implementation of both the strategic and annual plans, and also the carrying out of compliance with HUD program requirements.

Time Line

- Desk Audits are performed on a monthly basis. The benefit is two-fold. To review and confirm compliance to HUD regulations, and to identify high risk sub-recipients. High risk factors might include:
 - Sub-recipients who are new to the HUD programs implemented
 - Sub-recipients who have experienced high turnover in key staff positions
 - Sub-recipients struggling to meet schedules, submit performance reports, submit timely invoices
- On-Site Visits are scheduled annually

Process

On-site monitoring will continue to be conducted in the following manner:

- Personal contact with responsible party, as defined in application, to explain monitoring purpose and schedule date and time for on-site visit.
- Follow up letter confirming call, date and time of visit. This letter should also confirm aspects of the visit to explain what can be expected, what materials need to be provided, who should be present at meeting, and length of time needed to complete monitoring.
- Prior to site visit, monitor shall review all written data on file, including application agreement, previously submitted performance data, documentation of previous monitoring, and copies of audits

Monitoring Check List needs to be available during site-visit, to be completed by Monitor. Site visit includes:

- Entrance conference to clarify purpose, scope and schedule
- Thorough review of sub-recipient's files to ensure compliance with all administrative, financial and programmatic regulations.
- Exit interview to present preliminary findings to key representatives, clarify position, and clear up misunderstandings
- Follow up letter is sent to facility describing visit, and results
- Depending upon condition of records, several results are possible

Site Visit Results

Follow up letter will be sent within 10 days of on-site visit, thanking the facility for their time and cooperation and offering recommendations to address and rectify any problems that were encountered. The following may be instituted, ranging from mild to severe actions:

- Provide recommendation; no follow up action necessary
- Identify deadline when specific issues must be corrected. Re-visit to site, or have organization send documentation showing correction
- Organization placed on probationary period, until sub-recipient is in compliance
- Restrict payment requests until sub-recipient is in compliance
- Do not renew organization award in next program year
- Terminate organization for the current year

Priority Needs Analysis and Strategies (91.215 (a))

1.Describe the basis for assigning the priority given to each category of priority needs.

2.Identify any obstacles to meeting underserved needs.

3-5 Year Strategic Plan Priority Needs Analysis and Strategies response:

1. Basis for Assigning Priorities

The priorities needs identified in this plan are derived from the input obtained from numerous outreach efforts, surveys, and consultations used to identify community needs and establish this Consolidated Plan's priorities. Prioritization also takes into consideration feasibility of projects, impact of the costs of larger projects on other priorities, the anticipated funding levels for the CDBG program, and other sources of funding that may be available to address established needs.

2. Obstacles to Meeting Underserved Needs

See General Questions above

Lead-based Paint (91.215 (g))

1. Estimate the number of housing units that contain lead-based paint hazards, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income, and moderate-income families.

2. Outline actions proposed or being taken to evaluate and reduce lead-based paint hazards and describe how lead based paint hazards will be integrated into housing policies and programs, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.

3-5 Year Strategic Plan Lead-based Paint response:

1. Housing Units with Lead-Based Paint

The City of Nashua is designated, by the NH Childhood Lead Poisoning Prevention Program, as a high-risk community. In New Hampshire (NH), communities with 27 percent or more of the housing stock built before 1950 are considered high-risk. Our high-risk status, combined with other income and socio-economic factors, demonstrates the need for significant efforts to address lead hazards in housing occupied by low-income households.

Lead is highly toxic and affects virtually every system of the body. It can damage a child's kidneys and central nervous system and cause anemia. At very high levels, lead can cause coma, convulsions, and death. Even low levels of lead are harmful. Levels as low as 10 micrograms of lead per deciliter of blood ($\mu\text{g}/\text{dL}$) are associated with decreased intelligence, behavior problems, reduced physical stature and growth, and impaired hearing. According to HUD's Eliminating Childhood Lead Poisoning: A Federal Strategy Targeting Lead Paint Hazards, a child is estimated to lose 2 IQ points for each 10 $\mu\text{g}/\text{dL}$ increase in blood lead level. Lead toxicity has been well-established, with evidence of harmful effects found in children whose blood lead levels exceed 10 $\mu\text{g}/\text{dL}$. Although any child is potentially at risk, low income children living in deteriorated older housing (especially in inner-city neighborhoods) shoulder a disproportionately larger share of lead-poisoning cases. For example, 16% of low-income children versus 4.4% of non low-income children living in housing built prior to 1946 are lead poisoned.

The table below shows the characteristics of the City's housing stock. All housing units built before 1980 are counted herein as being likely to have lead based paint hazards. 1978 was the first year that Federal law prohibited the use of lead-based paint in residential property and housing data is only available in ten year increments.

Breakdown of Nashua's Housing Stock						
Housing Age	Renter		Owner		Total Units	% w/ Young Children
2000+	395	1.1%	1,070	3.1%	1465	30.7%
1980 to 1999	3,090	9.0%	6,890	20.0%	9980	12.1%
1960 to 1979	3,680	10.7%	8,005	23.2%	11685	13.3%
1940 to 1959	1,965	5.7%	2,840	8.2%	4805	18.7%
1939 or older	4,175	12.1%	2,415	7.0%	6590	15.2%
Total Units	13,305		21,220		34,525	
Total Pre-1980 Units	9,820		13,260		67%	47.2%

Source: 2009 CHAS Data

There are a total of 34,525 housing units located in the City of Nashua. 67% of these units were built prior to 1980. Of those older units, 47% are estimated to be where young children reside. In Census tracts 105-108, 73% of the households are at or below 80% of the area median income (AMI) and 57.2% are at or below 50% AMI. According to Census data, of the 8,079 housing units within these tracts, 91% were built prior to 1980. Furthermore, 68% of Nashua's pre-1940 housing is located in the same area, which predominately renter-occupied. HUD's *Lead-Paint Safety* published by the Office of Healthy Homes & Lead Hazard Control, states 98% of pre-1940 units are likely to contain lead hazards. Therefore 4,625 units where the lowest-income residents reside and 6,810 in the City of Nashua may contain lead hazards.

2. Actions to Evaluate and Reduce Lead Based Paint Hazards

The City of Nashua successfully applied to HUD's Office of Healthy Homes and Lead Hazard Control for a three-year, \$3 million Lead-Based Paint Hazard Control Grant (LBPHCG). The effective dates of the grant are November 1, 2007 to October 31, 2010. During this time at least 150 existing residential units throughout the City will be made lead safe, with a focus on Census tracts 105-108. Grant funds of approximately \$10,000 per unit will be available to qualified low-income homeowners and landlords who rent to low-income tenants. Rental units assisted with LBPHCG funds are restricted to occupancy by low-income households for a three-year period following lead hazard reduction activities. Landlords must also give priority in renting to households with a child less than six years of age.

The LBPHCG funds have enabled the Urban Programs Department to create the Nashua Lead Paint Program, which works in partnership with the City's Division of Health and Community Services and Code Enforcement Department, Southern NH Services, Inc., Nashua Pastoral Care Center and Neighborhood Housing Services of Greater Nashua. These partnerships will strengthen the overall community network to provide lead poisoning education, outreach and training. As of this writing, the grant program addressed lead hazards in 173 units, 170 of which were in Census tracts 104-108. Another 26 units, also within Census tracts 104-108, are in the pipeline and expected to be complete by October 31, 2010. Although the lead grant has made great strides in assisting units, it is clear there is still much work to be done. We

recognize that funding alone will not solve this problem and strive to educate parents how to maintain a lead-safe home. The network the grant has created will continue these education efforts in the absence of the grant.

Another key component of the grant was to integrate lead hazard identification into Code Enforcement. Code Enforcement officers are often in homes where potential lead hazards exist. The Code department has been trained to identify these potential hazards as part of their overall evaluation and refer the occupants to appropriate services.

The City of Nashua's Division of Public Health and Community Services provides free blood lead screenings, education and home visits with a specialist from the Environmental Health Department. Nurses offer one-on one education with parents of children with elevated blood lead levels. The City is working toward reaching a "One Touch" approach in dealing with the multiple health hazards in homes. A one touch approach takes advantage of the fact that many different agencies may be visiting a home. Whichever is the first to get their foot in the door should identify the potential hazards, correct the problems, refer occupants to services or educate, thus reducing the number of visits/agencies to one home.

HOUSING

Housing Needs (91.205)

*Please also refer to the Housing Needs Table in the Needs.xls workbook

1. Describe the estimated housing needs projected for the next five year period for the following categories of persons: extremely low-income, low-income, moderate-income, and middle-income families, renters and owners, elderly persons, persons with disabilities, including persons with HIV/AIDS and their families, single persons, large families, public housing residents, victims of domestic violence, families on the public housing and section 8 tenant-based waiting list, and discuss specific housing problems, including: cost-burden, severe cost- burden, substandard housing, and overcrowding (especially large families).

2. To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must complete an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.

3-5 Year Strategic Plan Housing Needs response:

1. Projected Housing Needs

This chapter of the Consolidated Plan presents an overall assessment of the housing and community development needs in the City. In addition to the community outreach results, the needs assessment provides the foundation for establishing priorities and allocating resources to address the identified needs.

Note: In the following discussion, Extremely Low Income [ELI] is $\leq 30\%$ median. Very Low Income [VLI] is 30.1-50% median. Low Income [LI] is 50.1-80% median. Moderate Income is 80.1-95% median and Middle Income is 95.1-120% median.

In addition, it should be noted, that for the most part our analysis in this section is based on published CHAS 2009 data, which in turn is based on the US Census American Community Survey (ACS) conducted 2006-2008. This ACS data is generated from random surveys and has larger error rates than the Decennial Census. Moreover, some of the definitions are different from the CHAS data of 2000 and some of the data which would be helpful is not available at all.

The following tables outline the housing needs of groups such as extremely low-income, very low-income, low-income, moderate income, mid-level income, disabled, elderly, extra-elderly and family.

Definition of Housing Problems

Definition: A household is classified by HUD/US Census as experiencing housing problems when one or more of the following four housing unit problems exist:

- the unit lacks complete kitchen facilities,
- the unit lacks complete plumbing facilities,
- the unit has more than one person per room,
- the household has a cost burden greater than 30%.

Housing Problems by Income

Definition: Renters and owners of extremely low-income, very low-income and low-income households in the City are all at a risk of suffering from one or more of the housing problems described above.

Observation: As is evidenced by the data, detailed in Tables E1 and E2, the majority of households experiencing all types of housing problems, are low income. These households experience these problems at a rate greater than their percentage of the City population.

The ACS data indicates that 63% of low income households, representing 44% of all households in the City, have housing problems. Of this total low income group with housing problems, 25% are extremely low income and 31% are very low income. Renters outnumber owners in the ELI and VLI groups, while owners outnumber renters in the LI group.

The following tables show the numbers of owners and renters with housing problems.

Housing Problems by Income Level

	<=30% AMI		30.1-50% AMI		50.1%-80% AMI		Total <=80% AMI		Total
Housing Problems	Owner	Renter	Owner	Renter	Owner	Renter	Owner	Renter	<=80% AMI
HHs with Housing Problems	690	2,245	1,595	2,020	2,005	1,160	4,290	5,425	9,715
HHs without Housing Problems	95	345	665	430	1,870	1,750	2,630	2,525	5,155
HHs N/A*	30	385	0	30	0	35	30	450	480
Total	815	2,975	2,260	2,480	3,875	2,945	6,950	8,400	15,350

Source: CHAS/ACS 2009

* N/A means that the status of these households could not be determined

Housing Problems by Income Level

	80.1%-95%AMI		95.1%-120% AMI		120.1%+ AMI		Total
Housing Problems	Owner	Renter	Owner	Renter	Owner	Renter	All
HHs with Housing Problems	940	315	870	135	730	45	12,750
HHs without Housing Problems	1,390	1,070	2,265	1,720	8,065	1,580	21,245
HHs N/A	0	0	0	30	0	0	510
Total	2,330	1,385	3,135	1,885	8,795	1,625	34,505

Source: CHAS/ACS 2009

As is evident from the table below, thirty-nine percent of ELI owners and fifty-four percent of ELI renters with housing problems are below 20% of AMI (which approximates the poverty level).

Housing Problems by Income <20% AMI Level

	<20% AMI		% of ELI Group	
Housing Problems	Owner	Renter	Owner	Renter
HHs with Housing Problems	270	1,215	39%	54%
HHs without Housing Problems	0	185	0%	54%
HHs N/A	30	325	100%	84%

Source: CHAS/ACS 2009

Housing Problems for the Disabled

Definition: A household is by definition, disabled households contain at least one or more persons with a mobility or self-care limitation.

Observation: Among the City's disabled population, a total of 46% have housing problems. Fifty-nine percent of all low-income disabled have housing problems. Even more significant is the fact that three-quarters of extremely low-income disabled (both renters and owners) have housing problems. Low and extremely low-income disabled households with housing problems risk being forced into temporary relocation or homelessness.

Housing Problems of the Low Income Disabled

	<=30% AMI		30.1-50% AMI		50.1%-80% AMI		Total <=80% AMI		Total
Housing Problems	Owner	Renter	Owner	Renter	Owner	Renter	Owner	Renter	<=80% AMI
Disabled	50	385	315	160	55	105	420	650	1,070
Not-Disabled	640	1,860	1,280	1,860	1,950	1,060	3,870	4,780	8,650
Total	690	2,245	1,595	2,020	2,005	1,165	4,290	5,430	9,720
No Housing Problems	Owner	Renter	Owner	Renter	Owner	Renter	Owner	Renter	<=80% AMI
Disabled	0	90	120	60	255	180	375	330	705
Not-Disabled	95	255	545	370	1,620	1,570	2,260	2,195	4,455
Total	95	345	665	430	1,875	1,750	2,635	2,525	5,160
ALL DISABLED HHs	65	505	435	220	310	285	810	1,010	1,820
% of Disabled HHs with Housing Problems	77%	76%	72%	73%	18%	37%	52%	64%	59%
Disabled with Housing Problems as a % of Owner or Rental Population	6%	13%	14%	6%	1%	4%	6%	8%	7%

Source: CHAS/ACS 2009

Housing Problems of the Disabled above 80% AMI

	80.1%+ AMI		Total
Housing Problems	Owner	Renter	All
Disabled	225	105	1,400
Not-Disabled	2,320	390	11,360
Total	2,545	495	12,760
No Housing Problems	Owner	Renter	All
Disabled	820	105	1,630
Not-Disabled	10,900	4,270	19,625
Total	11,720	4,375	21,255
TOTAL ALL DISABLED HHs	1,045	210	3,075
% of Disabled HHs with Housing Problems	22%	50%	46%

Source: CHAS/ACS 2009

Housing Problems of the Elderly

Definition: *Elderly are aged 62-74 and extra-elderly are 75 and older.*

Observation: Elderly residents in the City face housing problems regardless of tenure status and income level. Since 2000 the elderly population in the City has increased by 12%, and is expected to continue to increase another 11% in the next five years*.

(*Source: ESRI Ibid).

Profile of Elderly in Nashua

Elderly Profile - Nashua		% of Elderly Group	% of Elderly group <=80 %
Total Elderly (62-74)	5,285		
Total Elderly (62-74) <80%	3,015		
Total Elderly (62-74) <80% With Housing Problems	1,690	32%	56%
Total Elderly (62-74) <30%	725	14%	24%
Total Extra-Elderly (75+)	3,665		
Total Extra-Elderly (75+) <80%	2,675		
Total Extra-Elderly (75+) <80% with Housing Problems	1,435	39%	54%
Total Extra-Elderly (75+) <30%	900	25%	34%
Total all Elderly (62+)	8,950		
Total all Elderly <=80% Median	5,690	64%	
Total all elderly <80% with housing problems	3,125	35%	

Source: CHAS/ACS 2009

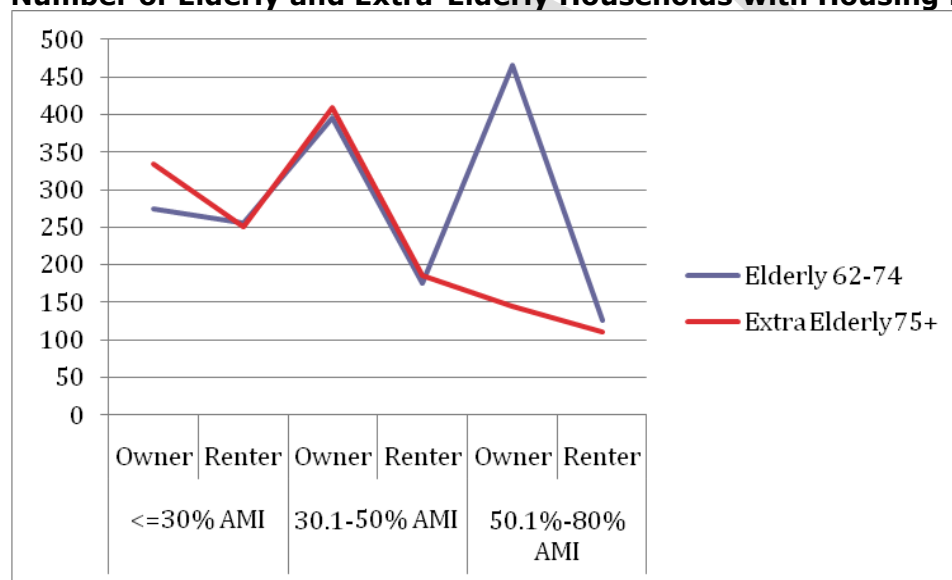
Although 38% of the City's elderly and extra-elderly population has housing problems, those at or below 80% of median, represent 92% of those elderly with housing problems.

Housing Problems for the Elderly and Extra-Elderly

	Extremely Low-Income (<=30% AMI)		Very Low-Income (30.1-50% AMI)		Low-Income (50.1%-80% AMI)		Moderate Income (80.1%-95% AMI)		Mid-Level Income(95.1%-120% AMI)		Total
With Housing Problems	Own	Rent	Own	Rent	Own	Rent	Own	Rent	Own	Rent	All
Elderly 62-74	275	255	395	175	465	125	70	20	75	0	1855
Extra Elderly75+	335	250	410	185	145	110	25	15	65	20	1560
Total Elderly with Housing Problems by Income Level	530		570		590		90		75		1855
Total Extra-Elderly with Housing Problems by Income Level	585		595		255		40		85		1560

Source: CHAS/ACS 2009

Number of Elderly and Extra-Elderly Households with Housing Problems



Housing Problems for Families

Definition: *Families are households with at least one child under the age of 18. Non-family households are composed of unrelated individuals.*

Observations: Both small and large households in the City are at some risk for having housing problems, with the dominant problem being cost burden. The table below shows the impact of housing problems on families of different types. Small households (families of four or fewer persons) dominate the landscape. Shaded cells indicate the households with problems where they represent more than 25% of all households in that group.

Housing Problems by Family Type

	Family, 1 Parent		Family, 2 Parents		Non-Family		Total Family		Total
Family Size with Housing Problems									
	Own	Rent	Own	Rent	Own	Rent	Own	Rent	All
Small - 4 or fewer	920	1,320	2,910	710	2,325	3,345	3,830	2,030	11,530
Large - 5 or more	65	170	620	320	0	55	685	490	1,230
Total	985	1,490	3,530	1,030	2,325	3,400	4,515	2,520	12,760
Family Size with No Housing Problems									
	1,010	410	5,240	700	1,905	1,595	6,250	1,110	10,860
Small - 4 or fewer	1,380	965	8,895	2,230	3,055	3,280	10,275	3,195	19,805
Large - 5 or more	140	70	885	355	0	0	1,025	425	1,450
Total	1,520	1,035	9,780	2,585	3,055	3,280	11,300	3,620	21,255
Family Size with Housing Problems as a % of All Families in Type									
	Own	Rent	Own	Rent	Own	Rent	Own	Rent	All
Small - 4 or fewer	17.66%	25.34%	17.16%	4.19%	18.82%	27.07%	17.28%	9.16%	33.40%
Large - 5 or more	1.25%	3.26%	3.66%	1.89%	0.00%	0.45%	3.09%	2.21%	3.56%

Source: CHAS/ACS 2009

Housing Problem Severity

Definition: *Housing problem severity is defined as a housing unit which is substandard: lacking complete plumbing or kitchen facilities, severely over-crowded: with 1.51 or more persons per room, or severely cost-burdened: housing cost-burden over 50%.*

Observation: Few renters or owners at any income level occupy sub-standard housing or live in severely overcrowded conditions. However, low income households do face both moderate and severe cost burdens. 59% of the City's ELI population is severely cost burdened. As the Chart below shows clearly, the major problem facing Nashua is the severe cost burden for both owner and rental households.

Housing Problem Severity

	Extremely Low Income <=30% AMI			Very Low Income 30.1-50% AMI			Low Income 50.1%-80% AMI			Total <=80% AMI			Total All <=80% AMI
Severe Housing Problems	SS*	SO	SC	SS	SO	SC	SS	SO	SC	SS	SO	SC	
Own	0	0	580	15	0	840	25	0	615	40	0	2,035	2,075
Rent	40	20	1,645	0	0	560	0	20	65	40	40	2,270	2,350
Total	40	20	2,225	15	0	1,400	25	20	680	80	40	4,305	4,425

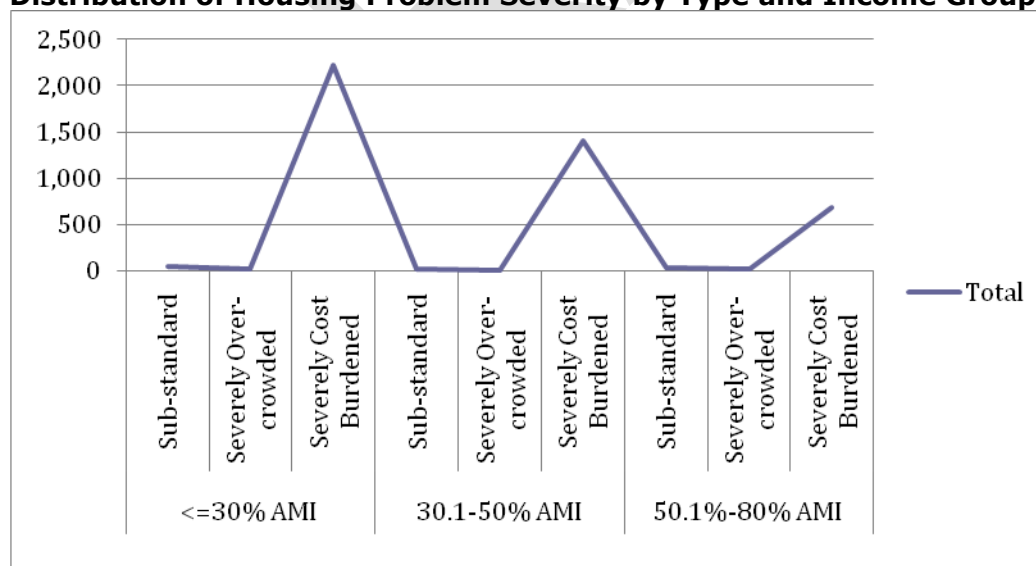
*SS – Sub-standard; SO – Severely overcrowded; SC – Severely cost burdened
Source: CHAS/ACS 2009

Housing Problem Severity

	Moderate Income (80.1%-95% AMI)			Mid-Level Income (>95.1% AMI)			Total All >80.1% AMI	Total All HHs with Severe Housing Problems
Severe Housing Problems	SS	SO	SC	SS	SO	SC	>80.1% AMI	
Owner	0	0	125	0	0	200	325	2,400
Renter	0	15	75	95	30	0	215	2,565
Total	0	15	200	95	30	200	540	4,965

Source: CHAS/ACS 2009

Distribution of Housing Problem Severity by Type and Income Group



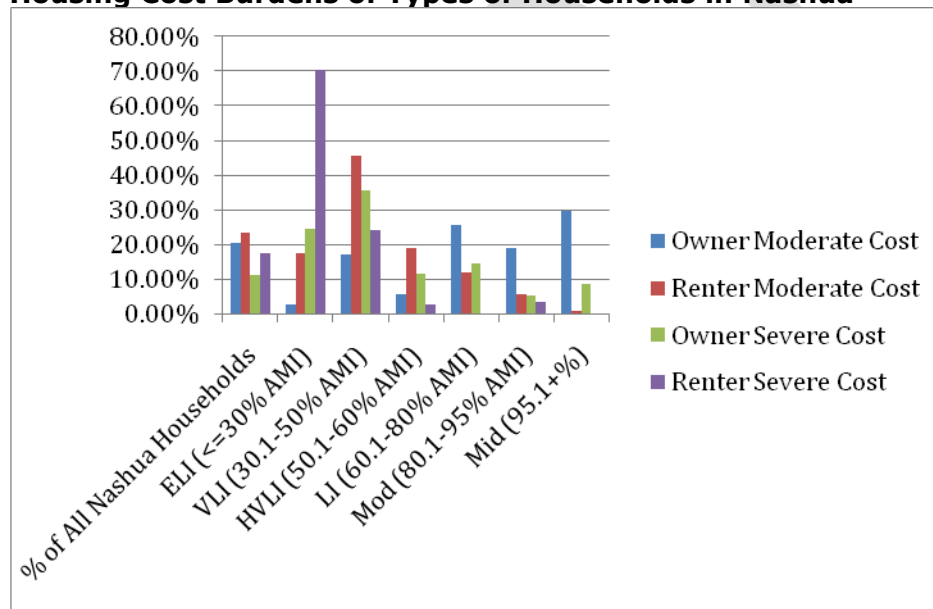
Source: CHAS/ACS 2009

Cost-Burden and Severe Cost-Burden

Definition: As noted above, households which suffer severe cost-burden have a housing cost burden of greater than 50%. Moderate cost-burden is considered to be a housing cost burden that is greater than 30% but less than or equal to 50%. Households that do not have a cost-burden have housing costs that are less than or equal to 30% of their monthly gross income.

Observations: As noted above, the dominant housing problem facing Nashua residents is housing cost-burden. Fourteen percent of all households have severe cost burdens (4,700) and 22% (7,445) have moderate cost burdens. In low, very low, and extremely low income groups, renters have higher proportions of severe and moderate cost burden, while owners have higher proportions of cost burdened households in the moderate and mid level income groups. Overall renters also have a slightly higher rate of severe and moderate cost burden across the different household types. The following chart illustrates the cost burdens for all owners and renters in Nashua in 2008. It is likely that any changes since then will have resulted in higher instances of both moderate and severe cost burden, given the further downturn in the economy. Further documentation is provided in a series of tables that follow this chart.

Housing Cost Burdens of Types of Households in Nashua



Cost-Burden by Household Type

	Small Family, elderly		Small Family, Non-Elderly		Large Family		All Other HHs		Total		Total
	Own	Rent	Own	Rent	Own	Rent	Own	Rent	Own	Rent	All
Severe Cost Burden	190	50	1,085	995	175	20	925	1,320	2,375	2,385	4,760
Moderate Cost Burden	630	265	2,020	770	275	255	1,400	2,035	4,325	3,325	7,650
No Cost Burden	2,370	360	7,995	2,955	1,070	480	3,055	3,330	14,490	7,125	21,615
Total	3,190	710	11,100	4,900	1,520	755	5,410	6,955	21,220	13,320	34,540

Source: CHAS/ACS 2009

The following tables analyze the cost burden distribution in more detail. The first table shows the moderate cost burden distribution and highlights the most notable proportions of those paying between 30% and 50% of their income for housing. These are very low, low, moderate, and mid level income owners, and renters earning less than 80% of the median.

Moderate Cost Burden by Tenure

	Own	%	Rent	%	All	%
All HH	21,215		13,310		34,525	
All Moderate Cost Burden (30-50% of HH Income)	4,325	20.39%	3,120	23.44%	7,445	21.56%
ELI (<=30% AMI)	110	2.54%	540	17.31%	650	1.88%
VLI (30.1-50% AMI)	745	17.23%	1,420	45.51%	2,165	6.27%
HVLI (50.1-60% AMI)	250	5.78%	590	18.91%	840	2.43%
LI (60.1-80% AMI)	1,110	25.66%	370	11.86%	1,480	4.29%
Mod (80.1-95% AMI)	815	18.84%	175	5.61%	990	2.87%
Mid (95.1+%)	1,290	29.83%	30	0.96%	1,320	3.82%

Source: CHAS/ACS 2009

The second table shows the severe cost burden distribution and indicates that owners earning less than 80% of median income and extremely low and very low income renters comprise the greatest proportion of those paying over 50% of their income for housing.

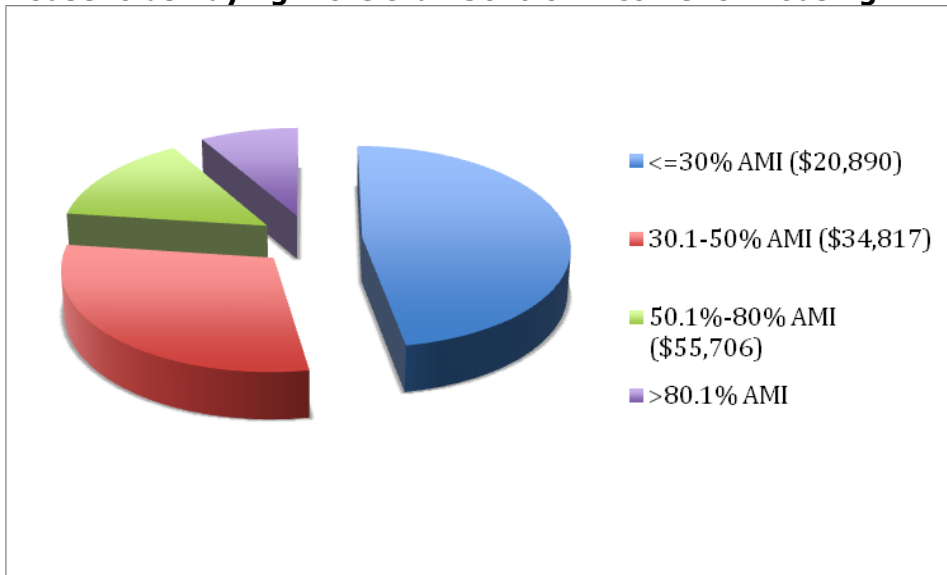
Severe Cost Burden by Tenure

	Own	%	Rent	%	All	%
All HH	21,215		13,310		34,525	
All Severe Cost Burden (>50% of HH Income)	2,360	11.12%	2,340	17.58%	4,700	13.61%
ELI (<=30% AMI)	580	24.58%	1,645	70.30%	2,225	6.44%
VLI (30.1-50% AMI)	840	35.59%	560	23.93%	1,400	4.06%
HVLI (50.1-60% AMI)	275	11.65%	65	2.78%	340	0.98%
LI (60.1-80% AMI)	340	14.41%	0	0.00%	340	0.98%
Mod (80.1-95% AMI)	125	5.30%	75	3.21%	200	0.58%
Mid (95.1+% AMI) as a % of all Moderate Cost HHs	200	8.47%	0	0.00%	200	0.58%

Source: CHAS/ACS 2009

The following chart illustrates this cost burden distribution.

Households Paying more than 50% of Income for Housing



Source: CHAS/ACS 2009

Substandard Housing

Definition: Substandard housing, another housing problem, is when a housing unit lacks complete kitchen or plumbing facilities. Standard housing is when the housing unit has both complete kitchen and complete plumbing facilities.

Observations: In general, few low-income households occupied substandard housing in 2008, regardless of any cost burden associated with substandard conditions.

Substandard Housing & Cost Burden by Income

	<=30% AMI		30.1-50% AMI		50.1%-80% AMI		Total <=80% AMI		Total	80.1%+ AMI		Total
Sub-standard	Own	Rent	Own	Rent	Own	Rent	Own	Rent	<=80% AMI	Own	Rent	All
Severe Cost Burden	0	40	15	0	0	0	15	40	55	0	0	55
Moderate Cost Burden	0	0	0	0	0	0	0	0	0	0	0	0
No Cost Burden	0	0	0	0	25	0	25	0	25	0	95	120
Total	0	40	15	0	25	0	40	40	80	0	95	175
Standard	Own	Rent	Own	Rent	Own	Rent	Own	Rent	<=80% AMI	Own	Rent	All
Severe Cost Burden	580	1,645	840	560	615	65	2,035	2,270	4,305	325	75	4,705
Moderate Cost Burden	110	555	745	1,460	1,365	1,100	2,220	3,115	5,335	2,105	205	7,645
No Cost Burden	95	345	665	460	1,875	1,785	2,635	2,590	5,225	11,835	4,535	21,595
Total	815	2,930	2,250	2,480	3,855	2,950	6,920	8,360	15,280	14,265	4,815	34,360

Source: CHAS/ACS 2009

Overcrowding

Definition: No overcrowding is when there is one person or less per room. Moderate overcrowding occurs when there is more than one person per room but less than or equal to 1.5 people. Severe overcrowding occurs when there are more than 1.5 people per room in the housing unit. A one-family household is a family household with no subfamilies. However a 2+ family household is a multi-family household composed of more than one family or subfamily. Non-family households are composed of unrelated individuals.

Observations: In general, neither families nor non-family households faced overcrowding in 2008. It should be noted that since 2008, when this data was developed, unemployment and subsequent loss of income has occurred. It would not be surprising for the Census 2010 to show an increase in over-crowding as families

"double up", which has been reported anecdotally by local service and housing organizations.

Overcrowding

	<=30% AMI		30.1-50% AMI		50.1%-80% AMI		Total <=80% AMI		Total	80.1%+ AMI		Total
Family Structure	Own	Rent	Own	Rent	Own	Rent	Own	Rent	<=80% AMI	Own	Rent	All
1 Family HH												
No Over-crowding	140	945	1,255	1,090	2,580	1,410	3,975	3,445	7,420	11,355	2,490	21,265
Moderate Over-crowding	0	0	0	40	0	120	0	160	160	0	75	235
Severe Over-crowding	0	20	0	0	0	0	0	20	20	0	45	65
Total	140	965	1,255	1,130	2,580	1,530	3,975	3,625	7,600	11,355	2,610	21,565
2+ Family HH	Own	Rent	Own	Rent	Own	Rent	Own	Rent	<=80% AMI	Own	Rent	All
No Over-crowding	0	50	20	0	65	0	85	50	135	280	50	465
Moderate Over-crowding	0	0	0	0	0	0	0	0	0	110	0	110
Severe Over-crowding	0	0	0	0	0	0	0	0	0	0	0	0
Total	0	50	20	0	65	0	85	50	135	390	50	575
Non-Family HH	Own	Rent	Own	Rent	Own	Rent	Own	Rent	<=80% AMI	Own	Rent	All
No Over-crowding	675	1,955	985	1,345	1,230	1,400	2,890	4,700	7,590	2,515	2,250	12,355
Moderate Over-crowding	0	0	0	0	0	0	0	0	0	0	0	0
Severe Over-crowding	0	0	0	0	0	20	0	20	20	0	0	20
Total	675	1,955	985	1,345	1,230	1,420	2,890	4,720	7,610	2,515	2,250	12,375

Source: CHAS/ACS 2009

2. Assessment of Racial/Ethnic Group Housing Needs

Utilizing CHAS/ACS data from HUD (2009) we have developed the following information about the housing needs of racial and ethnic groups:

The City's Hispanic population in 2009 is estimated to be approximately 9%, its Asian population is 6%, and its Black population is 2%.

Race and Ethnicity in Nashua 2000, 2009, 2014

	2000	2009	2014	Change 2000-2014
White Alone	89.2%	85.1%	82.4%	-4.38%
Black Alone	2.0%	2.4%	2.6%	32.99%
American Indian Alone	0.3%	0.3%	0.3%	13.82%
Asian Alone	3.9%	6.2%	7.8%	106.81%
Pacific Islander Alone	0.0%	0.0%	0.1%	58.62%
Some Other Race Alone	3.1%	4.4%	5.2%	76.68%

Two or More Races	1.5%	1.6%	1.7%	18.26%
Hispanic Origin (Any Race)	6.2%	8.9%	10.6%	76.17%

Source: ESRI. Note that ESRI minority numbers are significantly higher than ACS

The following table examines housing unit problems by income level and race. As a whole, White and Asian owners and renters, low income Hispanic owners and renters, and low income Black renters all have housing problems.

Housing Needs by Race

	<=30% AMI		30.1-50% AMI		50.1%-80% AMI		Total <=80% AMI		Total
Race with Housing Problems									
	Own	Rent	Own	Rent	Own	Rent	Own	Rent	<=80% AMI
White	645	1,885	1,360	1,555	1,800	1,090	3,805	4,530	8,335
Black	0	55	0	135	0	0	0	190	190
Asian	45	0	90	135	30	0	165	135	300
American Indian	0	0	0	0	25	0	25	0	25
Pacific Islander	0	0	0	0	0	0	0	0	0
Hispanic	0	300	125	155	150	55	275	510	785
Other	0	0	15	40	0	20	15	60	75
Total	690	2,240	1,590	2,020	2,005	1,165	4,285	5,425	9,710
Race with No Housing Problems									
	Own	Rent	Own	Rent	Own	Rent	Own	Rent	<=80% AMI
White	95	345	645	305	1,775	1,385	2,515	2,035	4,550
Black	0	0	0	0	0	0	0	0	0
Asian	0	0	0	20	75	100	75	120	195
American Indian	0	0	0	0	0	0	0	0	0
Pacific Islander	0	0	0	0	0	30	0	30	30
Hispanic	0	0	20	85	20	215	40	300	340
Other	0	0	0	25	0	15	0	40	40
Total	95	345	665	435	1,870	1,745	2,630	2,525	5,155
Total All	815	2,975	2,255	2,485	3,875	2,945	6,945	8,405	15,350
% of Owner or Renter Population									
	Own	Rent	Own	Rent	Own	Rent	Own	Rent	<=80% AMI
	3.84%	22.35%	10.63%	18.67%	18.27%	22.13%	32.74%	63.15%	44.46%

	80.1%-95%AMI		95.1%+ AMI		Total
Race with Housing Problems	Owner	Renter	Owner	Renter	All HHs
White	875	240	1,375	105	10,930
Black	30	0	40	50	310
Asian	15	0	190	0	505
American Indian	0	0	0	0	25
Pacific Islander	0	0	0	0	0
Hispanic	25	75	0	30	915
Other	0	0	0	0	75
Total	945	315	1,605	185	12,760
Race with No Housing Problems					
White	1,330	815	8,980	2,410	18,085
Black	30	0	150	165	345
Asian	0	45	795	635	1,670
American Indian	0	0	40	0	40
Pacific Islander	0	0	0	0	30
Hispanic	0	215	230	0	785
Other	30	0	140	90	300
Total	1,390	1,075	10,335	3,300	21,255
Total All	2,335	1,390	11,940	3,520	34,535
% of Owner or Renter Population	11.01%	10.44%	56.28%	26.45%	100.00%

Source: CHAS/ACS 2009

A concern of HUD and of the City is when there is a disproportionate need for any ethnic group. The table below shows that although there are challenges facing the households, there is no racial or ethnic group with a disproportionate share of housing problems.

Percentage of HHs with Housing Problems by Race

Race with Housing Problems	<=30% AMI		30.1-50% AMI		50.1%-80% AMI		Total <=80% AMI		Total <=80% AMI
	Owner	Renter	Owner	Renter	Owner	Renter	Owner	Renter	
White	79.14%	63.36%	60.31%	62.58%	46.45%	37.01%	54.79%	53.90%	54.30%
Black	0.00%	1.85%	0.00%	5.43%	0.00%	0.00%	0.00%	2.26%	1.24%
Asian	5.52%	0.00%	3.99%	5.43%	0.77%	0.00%	2.38%	1.61%	1.95%
American Indian	0.00%	0.00%	0.00%	0.00%	0.65%	0.00%	0.36%	0.00%	0.16%
Pacific Islander	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Hispanic	0.00%	10.08%	5.54%	6.24%	3.87%	1.87%	3.96%	6.07%	5.11%
Other	0.00%	0.00%	0.67%	1.61%	0.00%	0.68%	0.22%	0.71%	0.49%

Race with Housing Problems	80.1%- 95% AMI		95.1%+ AMI		Total
	Owner	Renter	Owner	Renter	
White	37.47%	17.27%	11.52%	2.98%	31.65%
Black	1.28%	0.00%	0.34%	1.42%	0.90%
Asian	0.64%	0.00%	1.59%	0.00%	1.46%
American Indian	0.00%	0.00%	0.00%	0.00%	0.07%
Pacific Islander	0.00%	0.00%	0.00%	0.00%	0.00%
Hispanic	1.07%	5.40%	0.00%	0.85%	2.65%
Other	0.00%	0.00%	0.00%	0.00%	0.22%

Source: HUD CHAS/ACS

The impact of severe housing problems affects all ethnicities in Nashua. When examined closer by race and ethnic group, the distribution of severe housing problems by race and ethnic group does not vary from that of the overall population.

Severe Housing Needs by Race

	<=30% AMI		30.1-50% AMI		50.1%-80% AMI		Total <=80% AMI		Total
Race with Severe Housing Problems	Own	Rent	Own	Rent	Own	Rent	Own	Rent	<=80% AMI
White	65.85%	48.99%	28.98%	16.10%	13.27%	2.89%	24.57%	23.13%	23.78%
Black	0.00%	1.85%	0.00%	3.22%	0.00%	0.00%	0.00%	1.61%	0.88%
Asian	4.88%	0.00%	3.98%	2.41%	0.00%	0.00%	1.87%	0.71%	1.24%
American Indian	0.00%	0.00%	0.00%	0.00%	0.64%	0.00%	0.36%	0.00%	0.16%
Pacific Islander	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%	0.00%
Hispanic	0.00%	6.38%	3.98%	0.00%	2.58%	0.00%	2.73%	2.26%	2.47%
Other	0.00%	0.00%	0.66%	0.80%	0.00%	0.00%	0.22%	0.24%	0.23%

	80.1%- 95% AMI		95.1%+ AMI		Total
Race with Severe Housing Problems	Owner	Renter	Owner	Renter	All
White	4.08%	6.50%	1.68%	1.28%	11.83%
Black	1.29%	0.00%	0.00%	1.42%	0.62%
Asian	0.00%	0.00%	0.00%	0.00%	0.55%
American Indian	0.00%	0.00%	0.00%	0.00%	0.07%
Pacific Islander	0.00%	0.00%	0.00%	0.00%	0.00%
Hispanic	0.00%	0.00%	0.00%	0.85%	1.19%
Other	0.00%	0.00%	0.00%	0.00%	0.10%

Source: CHAS/ACS

As we noted above, housing cost-burden proved to be the most significant housing problem in the City for low income households. Although housing cost burden is a problem for households in the City, the analysis shows that there is no racial or ethnic group with a disproportionate share of housing cost burden.

Cost Burden by Race (Numbers)

Race	Severe Cost Burden		Moderate Cost Burden		No Cost Burden		Total Moderate and Severe		Total
	Owner	Renter	Owner	Renter	Owner	Renter	Owner	Renter	All
White	1,985	1,985	4,030	2,800	12,865	5,350	6,015	4,785	29,350
Black	30	135	40	55	175	210	70	190	670
Asian	130	60	145	75	965	805	275	135	2,180
American Indian	25	0	0	0	40	0	25	0	65
Pacific Islander	0	0	0	0	0	30	0	0	30
Hispanic	190	190	110	350	275	590	300	540	1,860
Other	15	20	0	45	170	130	15	65	380
Total	1,985	1,985	4,030	2,800	12,865	5,350	6,015	4,785	29,350

Source: CHAS/ACS

Cost Burden by Race (Percentages)

Race with Housing Problems	Severe Cost Burden		Moderate Cost Burden		No Cost Burden		Total Moderate and Severe		Total
	Owner	Renter	Owner	Renter	Owner	Renter	Owner	Renter	<=80% AMI
White	83.58%	83.05%	93.18%	84.21%	88.79%	75.19%	89.78%	83.73%	84.99%
Black	1.26%	5.65%	0.92%	1.65%	1.21%	2.95%	1.04%	3.32%	1.94%
Asian	5.47%	2.51%	3.35%	2.26%	6.66%	11.31%	4.10%	2.36%	6.31%
American Indian	1.05%	0.00%	0.00%	0.00%	0.28%	0.00%	0.37%	0.00%	0.19%
Pacific Islander	0.00%	0.00%	0.00%	0.00%	0.00%	0.42%	0.00%	0.00%	0.09%
Hispanic	8.00%	7.95%	2.54%	10.53%	1.90%	8.29%	4.48%	9.45%	5.39%
Other	0.63%	0.84%	0.00%	1.35%	1.17%	1.83%	0.22%	1.14%	1.10%

Source: CHAS/ACS

Summary Conclusion

The attached CPMP data tables and the tables in this document quantify the estimated number of households who have housing problems, especially rent and ownership cost burdens. (Will be attached to final version)

Based on HUD standards, housing problems impact very low and extremely low income renters and then skew towards low income owners between 50% and 80% of median disproportionately than higher income households. More than half of the extremely low income renters with housing problems have incomes below 20% of median. This is a challenge.

Looking more closely at sub-populations, we know that almost all of the disabled with housing problems are below 80% median. Of these 435 households are below 30% median, which represents 41% of households below 80% of the median with housing problems.

The picture is similar for the elderly, where 92% of the elderly with housing problems are below 80% median. The total number of elderly households with housing problems is 3,415 and are evenly split between elderly and extra elderly (75+ years old), and in general owners have more housing problems than renters.

Small families and non-family households rather than large families are experiencing housing problems.

The Housing Needs Analysis shows that the most dominant problem facing households in Nashua is the cost burden of housing. 14% of the City's households are paying more than 50% of their income for housing. If one looks at those with incomes below 30% median, the percentage rises to 59%.

Economic development activities that strengthen job opportunities for low and moderate income individuals is key. Decent employment may alleviate the cost burden to low income families. Additionally, the preservation of existing rental units which are subsidized, as well as those affordable rental units provided by private landlords, is a critical strategy for the City. Rehab and other preservation approaches are also important. Lowering utility costs through retrofitting of energy and water improvements, can assist low income owners and renters. Assistance with repairs to properties, especially those occupied by low income elderly, can also be effective.

Priority Housing Needs (91.215 (b))

1. Identify the priority housing needs and activities in accordance with the categories specified in the Housing Needs Table (formerly Table 2A). These categories correspond with special tabulations of U.S. census data provided by HUD for the preparation of the Consolidated Plan.
2. Provide an analysis of how the characteristics of the housing market and the severity of housing problems and needs of each category of residents provided the basis for determining the relative priority of each priority housing need category.
Note: Family and income types may be grouped in the case of closely related categories of residents where the analysis would apply to more than one family or income type.
3. Describe the basis for assigning the priority given to each category of priority needs.
4. Identify any obstacles to meeting underserved needs.

3-5 Year Strategic Plan Priority Housing Needs response:

1. Priority Housing Needs

The following table outlines the City of Nashua's priority housing needs for the 2010-2015 Consolidated Plan period:

Priority Need (Households)	Priority Level	Funding Source
Renters		
0-30%	HIGH	HOME
31-50%	HIGH	HOME
51-80%	MEDIUM	HOME, CDBG
Owners		
0-30%	MEDIUM	CDBG
31-50%	MEDIUM	CDBG
51-80%	HIGH	CDBG
Non-Homeless Special Needs (0-80%)	MEDIUM	CDBG, City, Other
Homeless Individuals & Families	MEDIUM	CoC, CDBG

2. – 3. Analysis of Conditions/Basis for Assigning Priority

Analysis of the housing conditions is provided throughout this document. Specifically, see the “Summary Conclusion” in the preceding section, Housing Needs (91.205).

The priority housing needs identified in the chart above were based on the data available, whether other non-federal resources/agencies currently address the issues and the relative proportion each group represents of Nashua's housing stock. Since very low-income renters shoulder a disproportionate share of both housing problems and severe cost burden, a higher priority was assigned to that group. For owner, housing problems and severe cost burden fell predominately within the 51-80% income bracket. Non-Homeless special housing needs priority level was based on the aggregate of the groups it represents: Elderly, Frail Elderly, Severe Mental Illness, Physical and Developmental Disabled, Alcohol/Drug Abuse, HIV/AIDS and Victims of Domestic Violence. Of that group, elderly, frail elderly and disabled had high concentrations of low and very low income households with both housing problems and severe cost burden.

4. Obstacles to Meeting Underserved Needs

The obstacles to meeting these undeserved needs are much the same for each of the issues discussed in this document. Without question the largest impediment to addressing these needs is the cost of housing production coupled with the limited availability of funds.

Housing Market Analysis (91.210)

*Please also refer to the Housing Market Analysis Table in the Needs.xls workbook

1. Based on information available to the jurisdiction, describe the significant characteristics of the housing market in terms of supply, demand, condition, and the cost of housing; the housing stock available to serve persons with disabilities; and to serve persons with HIV/AIDS and their families. Data on the housing market should include, to the extent information is available, an estimate of the number of vacant or

abandoned buildings and whether units in these buildings are suitable for rehabilitation.

2. Describe the number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason, (i.e. expiration of Section 8 contracts).

3. Indicate how the characteristics of the housing market will influence the use of funds made available for rental assistance, production of new units, rehabilitation of old units, or acquisition of existing units. Please note the goal of affordable housing is not met by beds in nursing homes.

3-5 Year Strategic Plan Housing Market Analysis responses:

Overview

"Need" is difficult to define. The market forces of supply and demand have been the engines that have created disparities from time to time. For example, New Hampshire encountered an economic recession in 1990-1993 which resulted in a decline in housing production and an actual decline in market rents and housing prices. The opposite was true in the period 1998-2007. Now we have entered a period seemingly worse than the downturn in 1990-1993. The City has seen a decline in residential construction, as financing has declined and housing foreclosures have increased. However, the cost of rentals has decreased, while availability has increased.

When one examines more closely who benefited from the recent housing 'boom' and who is now being impacted by its decline, it is clear that many households who had been priced out of the market or who had been faced with increasing the proportion of income they had to set aside for housing, are in mortgage trouble. Moreover, as compensation is stagnant (7% decrease in real wages in the last 3 years) or even cut and as many household members have lost their jobs, it has become difficult to maintain mortgage payments. The first wave of foreclosures was of houses purchased in many cases with sub-prime mortgages. The latest wave is for houses which had adjustable rate mortgages and liberal underwriting standards (so called alt-A mortgages). Rental housing has been impacted by foreclosures. In some cases nationally, rental properties have been abandoned. Abandoned housing presents both an opportunity and potential hazards. Low-cost abandoned homes are attractive to developers, however long-term abandoned properties create neighborhood blight.

For those households above median income, although the cost of housing rose, they still had sufficient income for other basic needs. In housing economics, we refer to this phenomenon as **income elasticity**. Low-income families have less elasticity than higher income families. When the lower income households spend 50% of income on housing, the result is the neglect of other more basic needs.

1. Housing Market Characteristics

General Population Characteristics

The population in Nashua has been increasing since 2000. However, the rate of growth is expected to remain stable between 2009 and 2014. The population in New Hampshire rose nearly 10% between 2000 and 2009, and although the rate is expected to slow, it will continue to increase between 2009 and 2014. The growth in

Nashua has been slower than that of the overall population of New Hampshire and will continue to be so.

The following tables summarize the basic characteristics of the City's population.

Population Characteristics

	2000 Total Households	2009 Total Households	2014 Total Households
Nashua	34,614	35,469	35,813

Source: ESRI forecasts for 2009 and 2014

2000-2009 & Estimated 2014 Population Change

	2000 Total Population	2009 Total Population	% Change 2000-2009	2014 Total Population	% Change 2009-2014
Nashua	86,605	86,119	2.90%	89,697	0.65%
New Hampshire	1,235,786	1,337,493	8.97%	1,373,929	3.22%

Source: ESRI forecasts for 2009 and 2014

Housing Characteristics

The following tables show housing trends between 2000 and 2014. As mentioned previously, Nashua's population is expected to plateau. The proportions of low and extremely low income households are also expected to remain the same.

Overview of Population and Housing Characteristics

Summary	2000	2009	2014
Population	86,605	89,119	89,697
Households	34,614	35,469	35,813
Low Income	13,482	13,672	13,938
Extremely Low Income	3,955	4,072	4,148
Families	22,083	22,364	22,442
Average Household Size	2.46	2.47	2.46
Owner Occupied Housing Units	19,703	20,652	20,479
Renter Occupied Housing Units	14,911	14,817	15,334
Median Age	35.8	37.9	38.0

Source: ESRI forecasts for 2009 and 2014

Overview of Trends

Trends: 2009-2014 Annual Rate	Nashua	State	National
Population	0.65%	2.72%	0.91%
Households	0.97%	3.22%	0.94%
Families	0.35%	2.72%	0.74%
Owner Households	-0.84%	2.00%	1.19%

Source: ESRI forecasts for 2009 and 2014

Racial/Ethnic Composition of Nashua

	2000	2009	2014
White Alone	89.2%	85.1%	82.4%
Black Alone	2.0%	2.4%	2.6%
American Indian Alone	0.3%	0.3%	0.3%
Asian Alone	3.9%	6.2%	7.8%
Pacific Islander Alone	0.0%	0.0%	0.1%
Some Other Race Alone	3.1%	4.4%	5.2%
Two or More Races	1.5%	1.6%	1.7%
Hispanic Origin (Any Race)	6.2%	8.9%	10.6%

Source: ESRI forecasts for 2009 and 2014

The minority population will have continued to increase at a modest rate between 2000-2014.

Nashua has less diversity than the US as a whole. The Diversity Index summarizes racial and ethnic diversity. The index shows the likelihood that two persons, chosen at random from the same area, belong to different race or ethnic groups. The index ranges from 0 (no diversity) to 100 (complete diversity). For example, the diversity score for Nashua is 39, which means there is a 39 percent probability that two people randomly chosen from the Nashua population would belong to different race or ethnic group. The US has a diversity rating of 61.

Ownership and Rental Housing

The table below indicates that while there has been a small decline in renter occupied units, most of it can likely be accounted for by the increase in vacant units. This may be due to the 2007-2009 spate of foreclosures but might also include unsold units of new construction and families who have voluntarily moved out of their homes without selling them.

Trends in Tenure for Nashua

	2000	2009	2014
Occupied	97.8%	95.8%	95.9%
Owner	55.7%	55.8%	54.9%
Renter	42.1%	40.0%	41.1%
Vacant	2.2%	4.2%	4.1%

Source: ESRI forecasts for 2009 and 2014

Tenure Characteristics

	2009 Total Housing Units	2009 Owner Occupied HU		2009 Renter Occupied HU		2009 Vacant Housing Units	
		#	%	#	%	#	%
Nashua	37,034	20,652	56%	14,817	40%	1,565	4%
Total New Hampshire	607,899	364,152	60%	153,041	25%	90,706	15%
Total US	131,278,867	77,088,155	59%	39,435,001	30%	14,755,711	11%

Source: ESRI forecasts for 2009 and 2014

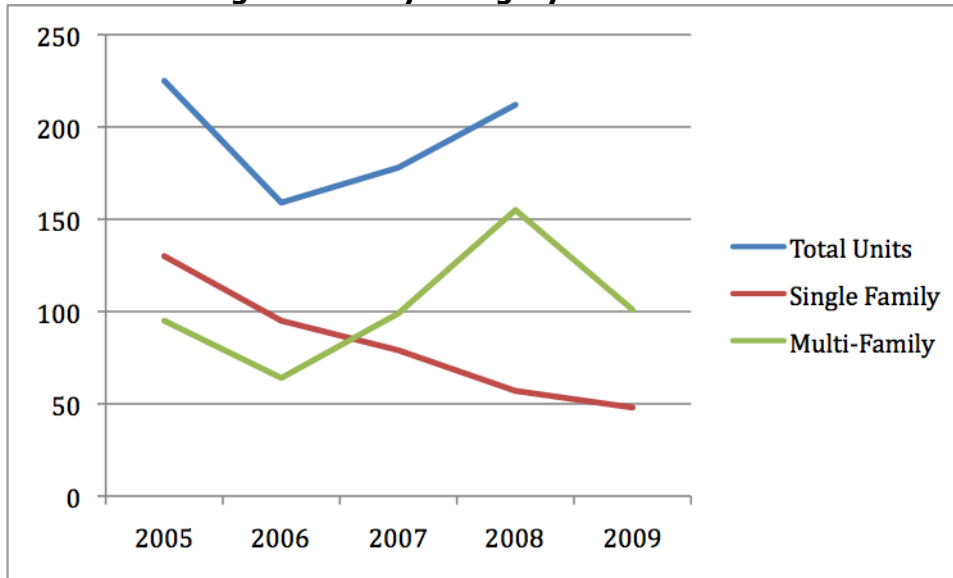
Note: The data in this table does not reflect the changes which have been occurring since early 2009.

The table above shows that in general the vacancy rate was less than the national and state average. Still, housing economists state that a 7% vacancy rate is necessary for an efficient rental market, thus there is some upward pressure with the current vacancy rate. It is not possible to generate current (2009) data separately for renters versus owners. Renter and owner occupancy rates for the City fluctuated slightly between 2000 and 2009. Renter occupancy experienced a 0.63% decrease and owner occupancy a 4.82% increase.

Housing Supply

There has been a significant overall decline in the rate of housing production over the last 5 years, which has the potential of causing a tightening of the housing market. However, until 2009, the annual rate of production differed between single-family and multi-family units. Whereas, single family production continued to decline annually, multi-family production, after declining in 2006, rose significantly in 2007 and 2008, before experiencing a decline in 2009.

Nashua Building Permits by Category



Source: HUD Building Permit Database

Nashua Building Permits by Category

	2005	2006	2007	2008	2009
Single Family	130	95	79	57	48
Multi-Family	95	64	99	155	101
Total	225	159	178	212	149

Source: HUD Building Permit Database

Affordability

The CHAS/ACS survey of 2008 analyzed the occupancy characteristics of households in Nashua. The focus of this analysis was to determine the extent to which there were mismatches between the cost of the housing and incomes of the occupant families. (The creation of the Owner Affordability dimension requires a series of assumptions, in order to determine the relationship between a housing unit's value and the monthly mortgage payment required to purchase it. HUD assumed a 31% monthly payment standard, 96.5% loan-to-value rate, a 5.5% interest rate, a 1.75% upfront insurance premium, a .55% annual insurance premium, and 2% annual taxes and insurance. Based on these assumptions, HUD estimated value to income ratio of 3.36 for an "affordable" home. Renter Affordability assumes that a 30% monthly payment standard is the threshold for affordability). In an ideal world, households would be occupying housing whose cost was such that they were neither over-paying nor underpaying (although underpaying is not a critical problem).

The following tables show how households are distributed in terms of income and in terms of whether the cost of that unit being occupied is affordable to a household in that income bracket. For example, if a house which is affordable to a low income household (50.1%-80% AMI) was being occupied by anyone whose income was extremely low income ($\leq 30\%$ AMI), then one would say, that that extremely low income family was being cost burdened because they are living in a house which is NOT affordable to them (see shaded cells below).

Number of Owner Housing Units with and without Mortgages Affordable to Households in 2008

	Occupied by HHs $\leq 30\%$ AMI	Occupied by HHs 30.1-50% AMI	Occupied by HHs 50.1-80% AMI	Occupied by HHs $> 80.1\%$ AMI	Total Occupied
Affordable to HHs $\leq 30\%$ AMI	260	430	475	350	1,515
Affordable to HHs 30-50% AMI	185	725	1,095	3,460	5,465
Affordable to HHs 50-80% AMI	135	630	980	3,640	5,385
Affordable to HHs $> 80\%$ AMI	230	450	1,305	6,835	8,820
Total	810	2,235	3,855	14,285	21,185

Source: HUD ACS

The same analysis is repeated for rental units below.

Number of Rental Housing Units Affordable to Households in 2008

	Occupied by HHs $\leq 30\%$ AMFI	Occupied by HHs 30.1-50% AMFI	Occupied by HHs 50.1-80% AMFI	Occupied by HHs $> 80.1\%$ AMFI	Total Occupied
Affordable to HHs $\leq 30\%$ AMFI	1,095	185	170	60	1,510
Affordable to HHs 30-50% AMFI	910	935	665	685	3,195
Affordable to HHs 50-80% AMFI	840	1,265	1,895	3,510	7,510
Affordable to HHs $> 80\%$ AMFI	80	95	220	555	950
Total	2,925	2,480	2,950	4,810	13,165

Source: HUD ACS

83% of owner and 28% of renter occupied houses that are affordable to households below 30% AMI are occupied by households who earn above 30% AMI. Similarly, 60% of owner and 35% of renter occupied housing units that are affordable to households below 80% of median income in the City are occupied by households earning above 80% of median.

Households move in and out of the non-subsidized housing stock, so that at any one time, mismatch analysis such as we have done above, is just a snapshot in time. During the period of 1995 through 2007, when housing prices soared, there was

significant conversion of rental housing to ownership and also a rise in rental rates. This became a loss of affordable housing. HUD conducted a study in 2007. (HUD PD&R Rental Market Dynamics: 2005-2007). This study concluded that the three most affordable categories—non-market units, extremely low rent units, and very low rent units—posted large decreases in the number of units between 2005 and 2007. The three categories combined declined by between 1.5 and 2.0 million units nationally.

The study above, showing how many affordable units there are in Nashua, including subsidized and unsubsidized housing units. There are two categories of subsidies – deep subsidies such as Public Housing, that ensure a household is not cost burdened, while other subsidy mechanisms, such as Tax Credits and HOME typically reduce housing cost, but do not ensure that the household is limited to paying 30% of their income.

If we do the same analysis as above, but for housing units which were vacant in 2008, there are 220 vacant housing units in standard condition that are not subsidized but are affordable to households below 30% of the median.

Number of Vacant Owner Units Affordable to Households in 2008 Vacant Ownership Units - Standard Condition	Bedroom #			Total
Affordability	0 or 1	2	3+	
Affordable to HHs at 50% AMI	60	0	0	60
Affordable to HHs at 80% AMI	0	0	0	0
Affordable to HHs at 100% AMI	0	0	0	0
Affordable to HHs above 100% AMI	0	0	60	60
Total	60	0	60	120
Substandard Vacant Units				0

Source: HUD PD&R Rental Market Dynamics: 2005-2007

Number of Vacant Renter Units Affordable to Households in 2008

Vacant Rental Units - Standard Condition	Bedroom #			Total
	0 or 1	2	3+	
Affordability				
Affordable to HHs at 30% AMFI	0	0	50	50
Affordable to HHs at 50% AMFI	185	135	0	320
Affordable to HHs at 80% AMFI	0	740	80	820
Affordable to HHs above 80% AMFI	0	0	0	0
Total	185	875	130	1,190
Substandard Vacant Units				35

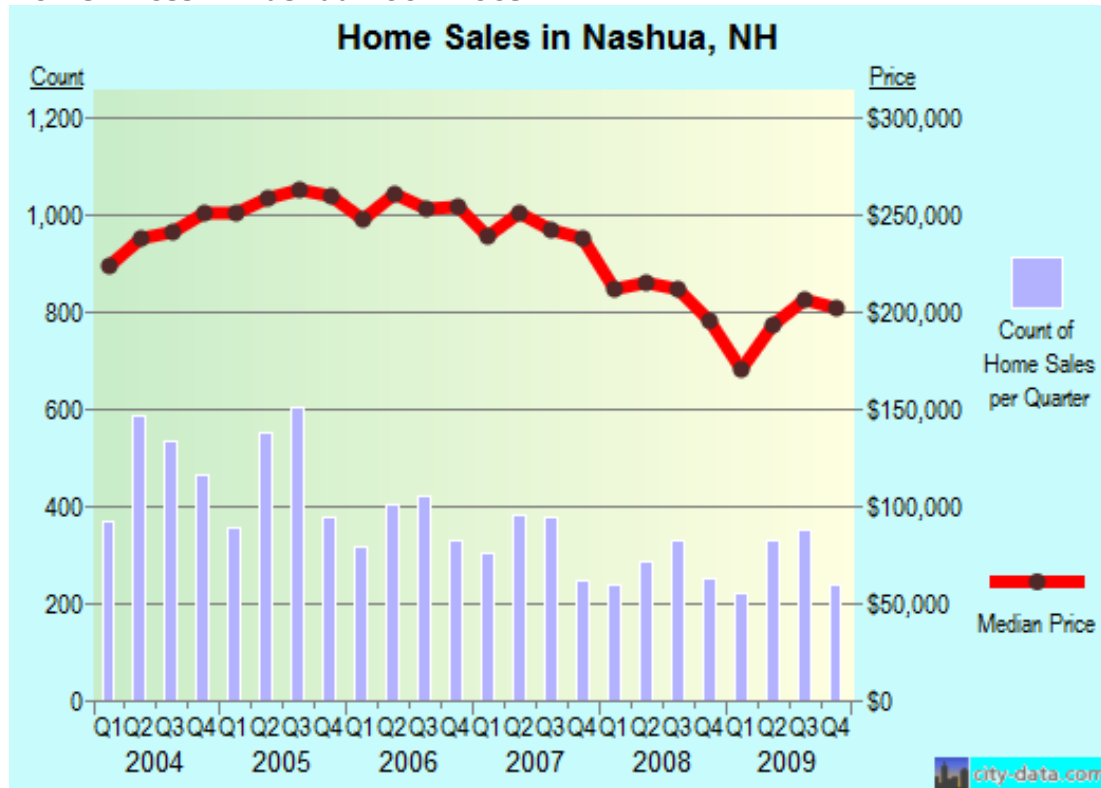
Source: HUD PD&R Rental Market Dynamics: 2005-2007

Matching these severely cost-burdened rental households to these affordable units, could help ameliorate problems for them. A similar approach could be taken for low income owner households with severe cost burdens. In addition, as there were 35 vacant sub-standard rental units in 2008, a strategy of acquiring and rehabbing these would provide some additional affordable housing.

Ownership Affordability

Since 2005 there has been a modest decline in housing values, but this decline is hard to analyze in terms of how it has affected the target CDBG population – namely, households below 80% of median income.

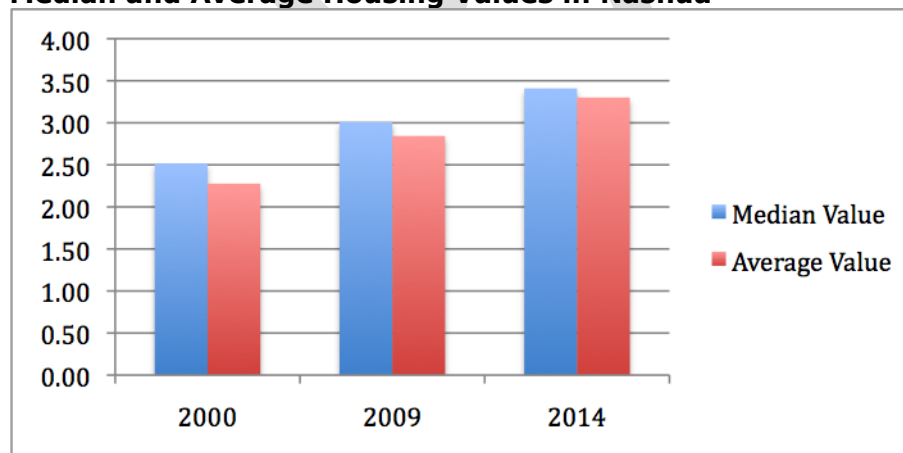
Home Prices in Nashua 2004-2009



Source: City Data.com

Whether one looks at medians (which can be distorted by extreme pricing differentials) or averages, the trend is similar, as the chart below illustrates.

Median and Average Housing Values in Nashua



Source: ESRI

Another illustration of housing affordability is to look at the cost of housing divided by household income, which generates an indicator ratio which illustrates the growing cost burden of ownership housing.

Median Housing Price as a Multiple of Median Household Income

	1980	1990	2000	2009
US	2.79	2.64	2.66	2.97

Source: ESRI

Median and Average Housing Values as a Multiple of Median and Average Household Income for Nashua

Nashua	2000	2009	2014
Median Housing Value to Median Income Ratio	2.52	3.01	3.41
Average Housing Value to Average Income Ratio	2.28	2.84	3.30

Source: ESRI

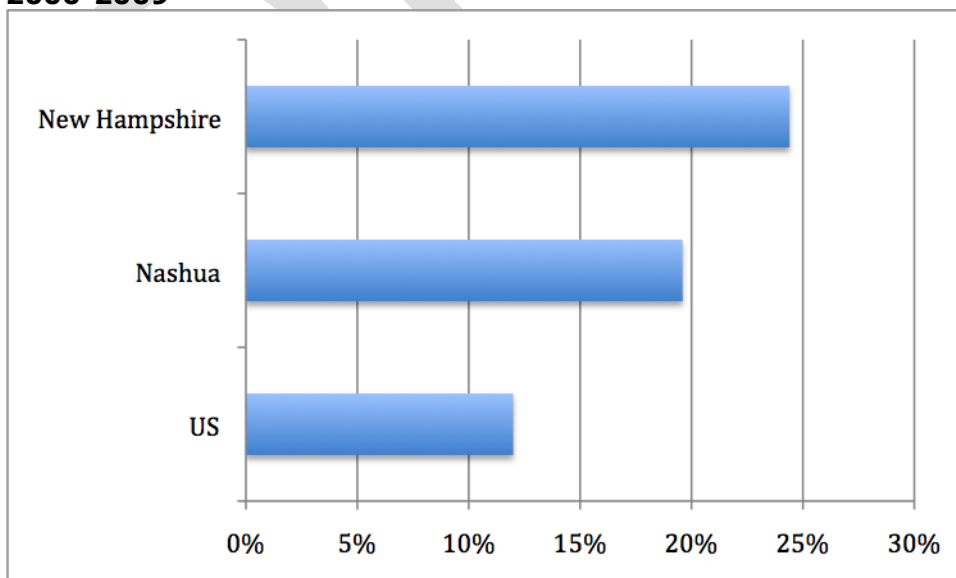
These tables illustrate the multiple of household income divided into the value or cost of housing in Nashua and compares that with the US. Historically the US average has been around 2.75, but after 1980 it rose significantly to a value of 2.97 in 2009. The ratio is a better measure, in that it accounts for differences in income and housing costs in any city or town. These ratios illustrate that households entering the homeownership market in 2009 needed substantially more of their income to purchase a home than they did in 2000. It also illustrates a modestly higher relative cost of housing in Nashua.

If the median housing value for the City dropped by about \$3,000, then the ratio would equal that of the US as a whole.

This has and will continue to have implications for the future of businesses in the area, which rely on or employ middle and lower income people.

The Chart below shows how the relative cost of housing in terms of income rose substantially between 2000 and 2009 in Nashua. In the US the ratio rose 12%, while Nashua's rose 20%, and New Hampshire's rose 24%. This has severe consequences for homebuyers as home prices are rising steeply whereas the residents' incomes are not.

Change in Median Housing Value as a Ratio of Median Household Income 2000-2009



Source: ESRI

When one examines households that are at or below 80% of median income, it becomes clear that the number of affordable housing units (either single-family homes or condominiums) available is seriously limited. For a family of four in Nashua to pay 30% of its income for housing, the cost of the home cannot exceed \$187,174. Currently, approximately 53 of the more than 300 single family home for sale meets that criteria.

2009 Monthly Owner Maximums for Low Income HHs

	Median HH Income	Group Median Income	Monthly Max at 31% of Income	HUD Affordable Unit at 3.36 Income to Value Ratio
ELI	\$69,633	\$20,890	\$540	\$70,190
VLI	\$69,633	\$34,817	\$899	\$116,983
LI	\$69,633	\$55,706	\$1,439	\$187,174

Source: ESRI

In addition, we examined home sales prices in the City to see what was available as of April 6th, 2010.

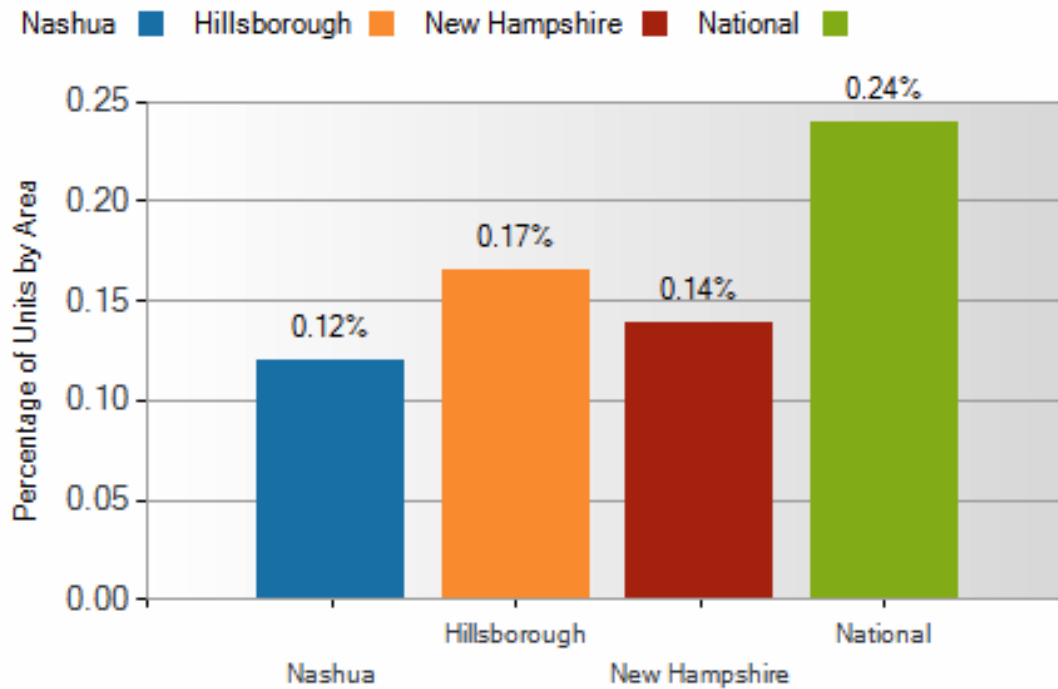
Home Sales Listings at 4/6/2010

Income Group	Number of Listings below Maximum	Lowest Single Family Home Offered	Lowest Single Family Home as a % of HUD Affordable HU	Affordable to HH with Income of	Percentage of Median
Extremely Low Income ≤30% AMI	20	\$29,900	42.60%	\$8,038	38.48%
Very Low Income 30.1% -50% AMI	8	\$74,000	63.26%	\$19,892	57.14%
Low Income 50.1% -80% AMI	25	\$119,900	64.06%	\$32,231	57.86%

Source: ESRI, Raveis Real Estate

The cost of housing relative to income led some buyers to take out questionable loans with "teaser" rates and adjustable rate mortgages. This in turn was a factor in the recent real estate troubles, evidenced by the rising rate of mortgages being placed into the process of foreclosure and in foreclosures.

Foreclosure Rates in Nashua and Surrounding Geographies



Source: RealtyTrac 3-16-2010

One of the factors driving these housing prices over recent years has been the increase in the size of the average house. In 1970 the average home was 1,500 square feet. In 2001 it was 2,527 square feet. Moreover, the number of bathrooms, kitchen appliances and other amenities has also increased. Construction costs have also escalated, so that the combination of rising land costs, increasing size of homes, multiplication of amenities and the rising cost of construction have been reflected in the rising value of housing.

Average Total Square Footage and 1993-2001 Change for U.S.

	Total Square Footage		Percentage Change
	1993	2001	
All Housing Units	1,875	2,066	10.6
Single-Family Housing Units	2,278	2,527	10.9
-Single-Family Detached	2,337	2,553	9.2
-Single-Family Attached	1,799	2,373	31.9
Apartments	972	1,043	7.3
-In 2-4 Unit Buildings	1,198	1,393	16.3
-In 5 or more Unit Buildings	861	847	-1.6
Mobile Homes	975	1,062	8.9

Source: Department of Energy

In addition, those who secured their homes prior to 1995 were able to lock in lower housing costs. Purchasers since then have seen (until late 2007), a large growth in housing costs. One of the key factors in this has been the required revaluation of property by tax assessors to regularly reassess all property at full market value. The adjustments made to all housing valuations since 1995 (when courts nation-wide began forcing cities and towns to go to full market valuation for assessment purposes), have particularly impacted owners whose assessed housing values were artificially low.

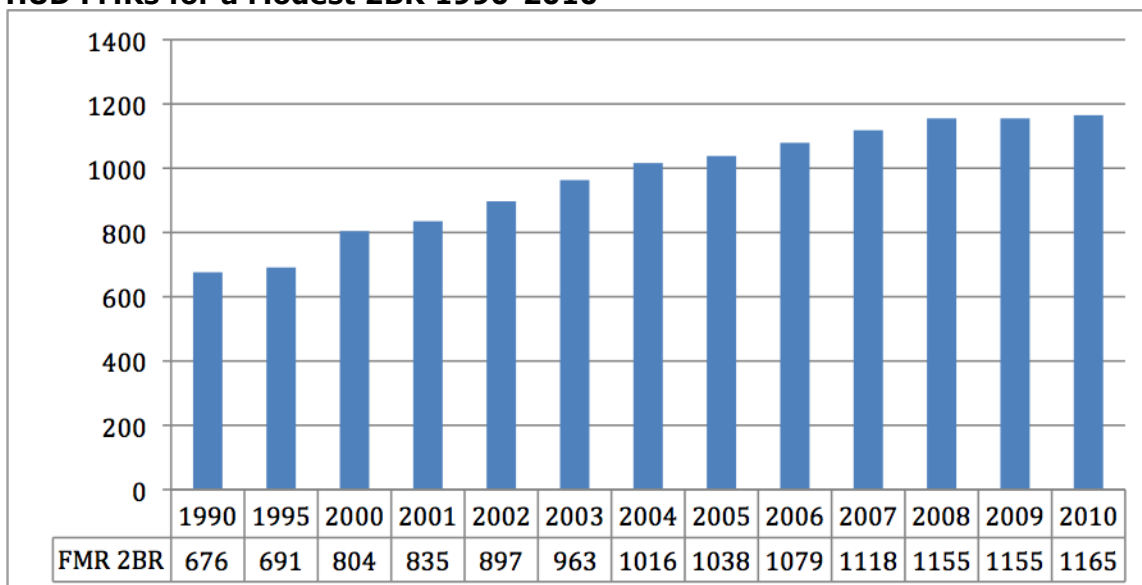
Any increase in housing valuation would result in an increase in taxes and insurance (which tends to track housing valuations). This impacts poorer households disproportionately, because it increases their cost of housing as a percentage of income and they benefit less financially from income deductions available to homeowners.

The groups most impacted are those on fixed or declining incomes, of which the elderly form the most significant segment. Although, in the last year, the recession has caused loss of jobs and in some cases reduction in salaries, wages and benefits, impacting the non-elderly in the workforce as well. The most recent CHAS/ACS data from 2008 demonstrates that the number of elderly and family households paying more than 30% of their monthly income for housing is high, particularly amongst small families. A significant proportion of the low-income elderly households in the City are also troubled by housing problems.

Rental Affordability

The real estate changes over the past 5 years are also reflected in the rental market. The following table illustrates HUD's own analysis of rent levels for modest housing affordable to households with incomes at or below 80% of median income.

HUD FMRs for a Modest 2BR 1990-2010



Source: HUD FMR database

2009 Monthly Rental Maximums for Low Income HHs

	Median HH Income	80% Median Income	Monthly Max at 30% of Income	HUD FMR 2BR 2008	% Above/Below HUD 2BRFMR
Nashua	\$69,633	\$55,706	\$1,393	\$1,115	19.94%

**As the largest groups of people on PHA waiting lists in the region are people requiring a 2 bedroom unit, we have used the 2 bedroom as the comparative value.*

Source: ESRI, HUD FMR database

In addition, we examined the rental listings in a selection of the communities to see what was available as of April 6th, 2010.

Rental Listings at 3/10/2010

	Listings 4-6-10 below Monthly max at 80% Median	Lowest 2 Bedroom Unit Rent Offered	HUD FMR 2BR 2010	Lowest rent available as a % of HUD FMR	Affordable to HH with Income of	Percentage of Median
Nashua	19	\$890	\$1,165	76.39%	\$35,600	51.13%

**Note that available units had to be within jurisdictional boundaries for this analysis, even though Federal vouchers can be used anywhere in the US.*

Source: ESRI, MyApartmentMap

2. Assessment of Units Currently Assisted

Throughout the City of Nashua, there are many assisted housing units available to low and moderate income households. The New Hampshire Housing Finance Authority reports a total of 1,554 units (298 accessible) subsidized with funding from either the U.S. Department of Housing and Urban Development, USDA - Rural Development, or New Hampshire Housing through permanent financing or rental assistance payment mechanisms.

As discussed in the Public Housing Strategy (92.210) section below, the NHA has 662 public housing units and 853 housing choice vouchers.

The City of Nashua has supported, through its HOME funds, 57 rental units dedicated to low and very low income households.

During the five-year period covered by this Consolidated Plan, 310 units may be lost to expiring use. However, 27 of those units have the option to defer loan payment by preserving the units as affordable and meeting all terms of the HOME program.

3. Housing Market Influence on Use of Funds

The profile of the Nashua population and estimations of those with housing problems and needs shows that housing cost-burden is the most prevalent housing problem, rather than physical substandard conditions. Projections for Nashua's population in 2014 show that the population growth is expected to slow while the proportion of low income and extremely low income are expected to stay the same. Combined with the increasing home price to income ratio, the number of cost burdened households in the City can also be expected to increase.

Between 2005-2009, new housing construction has declined. Through the HOME program, a small number of affordable housing units may be added to the housing stock. However the City must also take further measures to preserve existing rental and owner occupied units. Rehabilitation and other preservation tactics can also be effective.

Measures that can benefit both renter and owner households include the City enhancing affordable housing incentive zoning, such as density bonuses, that will help provide more housing choices for low and moderate income households.

Although Nashua's population is forecasted to slow its growth rate by 2014, this does not mean that the number of households with housing problems and needs will also stay the same or even decrease.

Specific Housing Objectives (91.215 (b))

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

3-5 Year Strategic Plan Specific Housing Objectives response:

1. Specific Housing Objectives

The table below summarizes the specific housing objectives the City hopes to achieve over the five year period from July 1, 2010 to June 30, 2015.

ACTIVITY	UNITS	GOALS
Rental Housing	Housing Units	40
Construction of Housing	Housing Units	10
Rehab, LMI Owner-Occupied Homes	Housing Units	50
Homeownership Assistance, Counseling/Education	Households	50
Ensure Safe Sanitary Housing (i.e. Code Enforcement, Lead Hazard Control)	Housing Units	75

2. Use of Resources for Housing Objectives

The characteristics of the housing market will significantly impact how the City will direct its housing funds over the next five years. Specifically, the City intends to focus its resources on homeownership. Homeownership provides households with an opportunity to build equity and benefits the community by encouraging neighborhood stabilization. Further the City will place emphasis on ownership in high rental, low income areas to encourage income diversity.

Needs of Public Housing (91.210 (b))

In cooperation with the public housing agency or agencies located within its boundaries, describe the needs of public housing, including the number of public housing units in the jurisdiction, the physical condition of such units, the restoration and revitalization needs of public housing projects within the jurisdiction, and other factors, including the number of families on public housing and tenant-based waiting lists and results from the Section 504 needs assessment of public housing projects located within its boundaries (i.e. assessment of needs of tenants and applicants on waiting list for accessible units as required by 24 CFR 8.25). The public housing agency and jurisdiction can use the optional Priority Public Housing Needs Table (formerly Table 4) of the Consolidated Plan to identify priority public housing needs to assist in this process.

3-5 Year Strategic Plan Needs of Public Housing response:

Any public housing authority receiving HUD funds is required to submit a five year and annual PHA Plan to HUD each year after a public planning and hearing process. One of the requirements of the process is that the PHA Plan has to be coordinated with and approved by the local Consolidated Plan agency. Additionally this Consolidated Plan has to be developed with the assistance of the PHA. The NHA has participated in the development of this plan through attendance at meeting and by providing the required data within. Data was either provided from the NHA or taken from their 2008-2012 five-year plan.

The Nashua Housing Authority's (NHA) mission is: *The Nashua Housing Authority is committed to providing excellence in the management of the Authority by providing quality affordable housing and programs that empower residents to achieve upward mobility as originally intended under the Public Housing Program.*

The NHA Board of Commissioners prescribed the Authority's Mission Statement in 1987. The Mission Statement sets the Authority's goals and objectives. The Resident Advisory Board (RAB) has reviewed the goals and objectives.

The RAB was formed by the Authority's soliciting participation from all public housing and Section 8 households. A new RAB was selected to serve. Both subsidized programs are represented. The NHA will always invite the Resident Commissioner to participate on the RAB.

The following Table summarizes the number of NHA public housing units in the City as of April 2010.

Federal Public Housing	Federal Housing Choice Vouchers
662	853 HCV 40 Dedicated Single Room Occupancy

Of the above 662 public housing units, 188 are elderly, 221 disabled and 253 family designated units.

On January 9, 2009, NHA received HUD approval for the designation of the following developments for a five-year period:

ELDERLY ONLY DEVELOPMENTS:

Vagge Village (partial designation for elderly only) – 25 units
Arel Manor (Elderly/Disabled portion) – 110 units
Temple Street Manor -43 units
Major Drive – 10 units

NON-ELDERLY DISABLED ONLY DEVELOPMENTS:

Vagge Village (partial designation for non-elderly disabled only) – 25 units
Sullivan Terrace North – 96 units
Sullivan Terrace South – 100 units

Condition of Units, Restoration & Revitalization Plans

NHA has been designated by HUD as a "High Performing Public Housing Authority", which streamlines the annual submission requirements. The overall condition of NHA's units is adequate. However, NHA recognizes investment is key to providing decent, safe housing.

The five-year NHA plan indicates approximately \$596,863 per year will be spent on physical improvements, for a total of just over \$16,000,000.

The estimated capital and operating projections of the NHA are documented in the table below as indicated in their five-year plan:

Category & Description	Planned Spending
<i>General Physical Improvements</i>	\$16,094,500
<i>Management Improvements</i>	\$20,000.00
<i>Non-Dwelling Structures & Equipment</i>	\$210,000
<i>Administration</i>	\$63,356
<i>Contingency</i>	\$73,913
<i>Operations</i>	\$169,783

Residents of the NHA noted on the annual PHAS resident surveys that their neighborhood appearances need improvement. The NHA will be strictly enforcing lease regulations within family developments regarding the upkeep of yard areas and issuing citations to residents found in non-compliance. In accordance with the NHA Residential Lease, residents will be subject to a graduated scale of charges for the removal of debris and rubbish when Maintenance staff are sent to clean yard areas, if not removed by the resident after receiving a yard citation to remove the debris and rubbish. NHA Public Housing management will plan Spring Clean-Up events at family developments and encourage residents to become involved with this process.

The Nashua Housing Authority will continue to provide housing that is decent, safe, sanitary and in good repair. At the same time they aim to be responsive to housing needs of the jurisdiction yet strive to be competitive with the local market for amenities and services. They will continue to provide safe and affordable housing to as many of their jurisdiction's extremely low, very low and low-income residents as possible.

Waiting Lists

Public housing and housing assistance for low and moderate-income families in Nashua faces ongoing shortages. The Nashua Housing Authority reports that as of April 1, 2010, it had 1,926 families on its Public Housing waiting list, and another 3,182 on the Vouchers waiting list.

The 1,926 family waiting list for public housing translates into a four to five-year wait. For senior citizens the wait could be much longer, as long as five to seven years.

The tables below detail the characteristics of families on the NHA waiting lists:

Housing Needs of Families on the Waiting List (PUBLIC HOUSING)			
	# of families	% of total families	Annual Turnover
Waiting list total	1,926	100%	147
Extremely low income <=30% AMI	1,756	91.2	
Very low income (>30% but <=50% AMI)	150	7.8	
Low income (>50% but <80% AMI)	18	1	

Housing Needs of Families on the Waiting List (PUBLIC HOUSING)			
Families with children	589	30.6	
Elderly families	105	5.4	
Families with Disabilities	403	20.9	
Race/ethnicity white	1,772	92	
Race/ethnicity black	120	6.2	
Race/ethnicity Hispanic	492	25.5	
Race/ethnicity Other	34	1.7	
Needs by Bedroom Size (Public Housing Only)			
	# of families	% of total families	Annual Turnover
1BR + 0 BR	813	42.2	88
2 BR	745	38.7	25
3 BR	301	15.6	27
4 BR	53	2.8	7
5 BR	14	.7	0
5+ BR	N/A	N/A	N/A

Housing Needs of Families on the Waiting List (SECTION 8)			
	# of families	% of total families	Annual Turnover
Waiting list total	3,182	100%	121
Extremely low income <=30% AMI	2,878	90.5	
Very low income (>30% but <=50% AMI)	296	9.4	
Low income (>50% but <80% AMI)	4	.1	
Families with children	1,046	32.9	
Elderly families	286	9	
Families with Disabilities	995	31.3	
Race/ethnicity white	2,937	92.3	
Race/ethnicity black	180	5.7	
Race/ethnicity Hispanic	818	25.7	
Race/ethnicity	65	2	

Housing Needs of Families on the Waiting List (SECTION 8)			
Other			

Public Housing Strategy (91.210)

1. Describe the public housing agency's strategy to serve the needs of extremely low-income, low-income, and moderate-income families residing in the jurisdiction served by the public housing agency (including families on the public housing and section 8 tenant-based waiting list), the public housing agency's strategy for addressing the revitalization and restoration needs of public housing projects within the jurisdiction and improving the management and operation of such public housing, and the public housing agency's strategy for improving the living environment of extremely low-income, low-income, and moderate families residing in public housing.

2. Describe the manner in which the plan of the jurisdiction will help address the needs of public housing and activities it will undertake to encourage public housing residents to become more involved in management and participate in homeownership. (NAHA Sec. 105 (b)(11) and (91.215 (k))

3. If the public housing agency is designated as "troubled" by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation. (NAHA Sec. 105 (g))

3-5 Year Strategic Plan Public Housing Strategy response:

1. Strategy to Serve Needs

The major focus of the agency has been on quality management of its programs, whether it is properties or vouchers and especially to ensure that turnover time is fast, so that vacancies are reduced and families on the waiting list can be housed quickly. Nashua Housing Authority strives to turn over vacancies in 10 days or less to applicants on its waiting list. The current rate of apartment turnover for FY 2010 is 5.5 days. Details of how the NHA will address the following needs can be found in their five-year plan: Shortage of affordable housing for all eligible populations; Families at or below 30% AMI; Families at or below 50% AMI; the Elderly; Families with disabilities; and Races or ethnicities with disproportionate housing needs.

Revitalization

Although agencies with federal public housing have had the advantage of a regular stream of capital funding and have used this stream to modernize and maintain their public housing, Nashua Capital Needs are approximately 35 million dollars; therefore it is difficult for Nashua Housing Authority to compete in the market place. NHA plans to invest approximately \$16,000,000 over the next five years to rehab and revitalize public housing units.

Living Environment

In addition to housing management and modernization, the NHA has also tried to identify needs for specialized housing and services, to support those who have needs which are not easily met in an independent living environment. Nashua Housing Authority works with area social service agencies and attends meetings regularly to address the needs of its residents.

2. City Support of Public Housing Activities

The city has limited resources to assist the needs of the NHA and its clients, especially when compared with the needs of those who do not have access to affordable housing. However, as the quality of the living environment for residents is critical to the neighborhoods within which public housing is placed, the Agency will do everything it can to support revitalization efforts.

The City directly or indirectly supports a number of special services to public housing residents, as follows:

1. Police Athletic League programs
2. Girls Inc. Programs
3. Boys & Girls Club programs
4. Nashua Youth Council programs
5. Public transportation service
6. Head Start programs at Housing Authority sites

Examples of capital City expenditures benefiting public housing residents include modernization and expansion of schools (Dr. Crisp, Amherst Street), reconstruction of streets and sidewalks (Burke Street, Lake Street, and many others), and improvement of recreation facilities (Skateboard Park on Ash Street, Murray, Lyons, and Haines Street fields, the Heritage Rail Trail). The City also operates neighborhood housing improvement programs in areas near public housing.

The City monitors Housing Authority efforts through a number of means, including Housing Authority Commission membership of an Alderman, liaison through the Mayor's office, receipt of regular reports, and interaction with staff at various levels. Residents participate in a number of ways that affect the management of public housing in Nashua. Residents are formally surveyed and public hearings held for their input into the Capital Fund Program. Many of the activities listed above reflect the preferences of residents, based on participation levels and feedback.

The Authority has previously overseen the sale of 54 units to residents, sale of a condominium unit to a resident, and the purchase and rehabilitation of a two-family home in cooperation with the City.

3. Troubled Designation

Nashua Housing Authority is not designated as a troubled agency and there are no indications that it has been performing poorly, in fact it is designated as a high performer by HUD.

Barriers to Affordable Housing (91.210 (e) and 91.215 (f))

1.Explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include tax policy affecting land and other property,

land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.

2. Describe the strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing, except that, if a State requires a unit of general local government to submit a regulatory barrier assessment that is substantially equivalent to the information required under this part, as determined by HUD, the unit of general local government may submit that assessment to HUD and it shall be considered to have complied with this requirement.

3-5 Year Strategic Plan Barriers to Affordable Housing response:

1. Public Policies Affecting Affordable Housing

Nashua, as the central city of a metropolitan area, has historically been the location of modest and affordable housing in the region. This stems from its early days as a mill town, while surrounding communities retained their primarily agricultural base.

Currently, there is still the dramatic difference in the characteristics of housing in Nashua compared to its region. Census data show that Nashua has 54% of the multi-family housing in the region, 56% of all duplexes, and 62% of the renter-occupied units. Further, the City has 13% of all the renter-occupied units in the State.

Although Nashua has a higher concentration of rental units and multi-family housing, a gap still exists between demand and supply of affordable units. When one examines households that are at or below 80% of median income, it becomes clear that the number of affordable housing units is limited. For a family of four in Nashua to pay 30% of its income for housing, the cost of the home cannot exceed \$187,174. As of this writing, only 53 of the more than 300 single family home for sale meets that criteria. However, thirty-one of these have fewer than three bedrooms. Almost one-half of the 175 condominiums available are in an acceptable price range; only twelve have more than two bedrooms.

The Housing Needs Analysis shows that the most dominant problem facing households in Nashua is the cost burden of housing. 14% of the City's households are paying more than 50% of their income for housing. If one looks at those with incomes below 30% median, the percentage rises to 59%.

There are little to no public policies affecting the limited availability of affordable housing. However, there are a few examples of barriers that do exist. Due to current economic downturns, many families have opted to house multiple households in one unit. Nashua does not restrict the number of related persons in one dwelling unit and there can be up to three unrelated people. The City's most affordable housing, namely rental, is coterminous with the inner city where the housing is dense, the population is predominately low-income and open space is limited. Parking in higher density areas or for homes with large families is a problem as there is no place to park on site, especially overnight due to a city wide ban on overnight parking (not a zoning or planning ordinance).

2. Strategy to Remove or Ameliorate Barriers

Property costs in Nashua, although increasing rapidly with the overall market, remain lower than those of all of its neighboring towns and most communities in the region. Property taxes are comparatively low and the City has historically encouraged diverse uses of land.

Nevertheless, the cost of affordable housing production remains high in the Nashua market. As a result, the City continues to work to eliminate barriers that may limit the production or feasibility of affordable housing construction that are within the capacity of local government to address. In 2006 the City adopted a new land use code that includes inclusionary zoning, which provides density incentives for projects where the applicant consents to designate some number of units as affordable.

HOMELESS

Homeless Needs (91.205 (b) and 91.215 (c))

*Please also refer to the Homeless Needs Table in the Needs.xls workbook

Homeless Needs— The jurisdiction must provide a concise summary of the nature and extent of homelessness in the jurisdiction, (including rural homelessness and chronic homelessness where applicable), addressing separately the need for facilities and services for homeless persons and homeless families with children, both sheltered and unsheltered, and homeless subpopulations, in accordance with Table 1A. The summary must include the characteristics and needs of low-income individuals and children, (especially extremely low-income) who are currently housed but are at imminent risk of either residing in shelters or becoming unsheltered. In addition, to the extent information is available; the plan must include a description of the nature and extent of homelessness by racial and ethnic group. A quantitative analysis is not required. If a jurisdiction provides estimates of the at-risk population(s), it should also include a description of the operational definition of the at-risk group and the methodology used to generate the estimates.

3-5 Year Strategic Plan Homeless Needs response:

Homeless Needs

The Greater Nashua (GNCOC) is the primary decision making group that manages the overall planning effort for the entire CoC. The communities served by the CoC include Nashua, Brookline, Amherst, Hollis, Merrimack, Milford, Mont Vernon, Hudson, Litchfield and Mason.

The problems of homelessness are complex, but the state, regional and local agencies that fund services for many homeless families and individuals, categorizes the root causes as:

- *structural issues* such as high housing costs or low household income
- *personal issues* such as mental illness, substance abuse or other physical and mental disabilities, and/or

- *social policies* such as the availability and effectiveness of assisted housing, mental health programs, substance abuse treatments, and other service interventions.

For virtually all homeless individuals and families, decent, safe, affordable housing is a critical step in ending homelessness. In some cases, this is their only need. However, often, in addition to affordable housing, homeless families and individuals also need supportive services to make the transition to independent living or to deal with other problems, including substance abuse or mental illness. Finally, in order to maintain themselves, these individuals and families may require assistance with childcare, transportation, life skills, job training and other basic life skills.

In addition, the continuing loss of affordable housing, the foreclosure crisis, in conjunction with the significant growth in unemployment, underemployment and low paying jobs, has exacerbated the problem of at-risk homeless individuals and families. In situations reported by service providers, the lowest income households frequently are living in overcrowded and substandard conditions that are likely to be providing short-term housing solutions. Young families and young adult individuals are living with other family members and are likely to be displaced due to family issues or the need of the primary occupant to rent the room that the at-risk household is living in. The increase in unemployment and underemployment has caused a significant rise in the homelessness among individuals and families with long-term work histories. Finally, expiring use properties continue to increase the risk of homelessness for existing tenants as well as remove a source of future affordable units from the market. In addition to those properties in Nashua that have already been removed through expiring uses, additional expiring use properties that will come into play over the next five years contain 310 units. Of those, 27 have the option to defer loan payment by keeping the units affordable.

From a financial standpoint, the households most susceptible to becoming homeless are households who are at less than 30% median income and are severely cost-burdened (paying more than 50% of their income for rent). Other populations disproportionately at risk of becoming homeless are victims of domestic violence, substance abuse, those with severe mental health problems and people leaving prison.

In order to address this at-risk population, there is a need for long-term permanent affordable housing and supportive transitional and permanent housing for the sub-populations that are over-represented among the at-risk and homeless. Counseling, health-care, life-skills training and sustainable employment at an adequate wage are all critical to reducing homelessness within the City.

On January 27, 2010, The GNCOC, in accord with the Continuum of Care planning process, conducted its annual point-in-time survey of its homeless population. Based on this census, it was determined that the number of homeless persons totaled 334.

The data on the homeless is in the CPMP file *needs.xls*.

Priority Homeless Needs

1. Using the results of the Continuum of Care planning process, identify the jurisdiction's homeless and homeless prevention priorities specified in Table 1A, the Homeless and Special Needs Populations Chart. The description of the jurisdiction's choice of priority needs and allocation priorities must be based on

reliable data meeting HUD standards and should reflect the required consultation with homeless assistance providers, homeless persons, and other concerned citizens regarding the needs of homeless families with children and individuals. The jurisdiction must provide an analysis of how the needs of each category of residents provided the basis for determining the relative priority of each priority homeless need category. A separate brief narrative should be directed to addressing gaps in services and housing for the sheltered and unsheltered chronic homeless.

2.A community should give a high priority to chronically homeless persons, where the jurisdiction identifies sheltered and unsheltered chronic homeless persons in its Homeless Needs Table - Homeless Populations and Subpopulations.

3-5 Year Strategic Plan Priority Homeless Needs response:

1. Homeless and Homeless Prevention Priorities

The GNCOC identified individuals and families (both sheltered and unsheltered), who were homeless on January 27, 2010 using a one night census of both sheltered and unsheltered homeless people, along with documentation from administrative records. The full results of the census and records analysis are in Tables 1 and 2 of the CPMP file *needs.xls homeless tab/sheet*.

The Continuum of Care process identified 236 households (211 sheltered and 25 unsheltered) and a total of approximately 334 people, who were homeless at a single point in time based on the one-night census of both sheltered and unsheltered homeless conducted in 2010, with further documentation from administrative records. In addition, it was reported from other sources that there were likely additional persons from Nashua were placed in motels outside of the CoC area and thus were not included in the count. The Continuum used the following definitions for emergency and transitional housing:

Emergency Shelter: "A supervised public or private facility designed to provide temporary living accommodations to persons (individuals and families) who lack a fixed, regular and adequate nighttime residence, for which they pay no rent or fees". Given HUD's definition, families placed by the state in motels are being counted as in emergency shelter. However, the Continuum deems this a completely inappropriate response to family homelessness and these families are a top priority for relocation to more appropriate settings.

Transitional Housing: "A longer-term residence (up to 24 months) for individuals or families coming from emergency shelters, or having no fixed, regular nighttime residence". These programs are designed to offer appropriate case management and supportive services to prepare residents for transition to permanent housing and independence in the community. Residents may pay program fees.

This annual 'point-in-time' update serves as the data source for completion of the "Current Inventory in 2009" section of the *HsgNeeds* Table in *needs.xls*. This update will be coordinated by the planning group. The methods used to collect the data were on the ground counting and surveys of police departments. The day of the point-in-time count, staff and other participating agencies conducted a follow-up phone survey

to verify that all information concerning shelter, transitional and permanent supportive housing inventory was accurate as of February 2010. The information for the "Under Development" column was determined through a review of fully funded projects to be targeted to homeless people.

The GNCOC will determine the annual inventory, based upon a 'point-in-time' survey in the last week of each January from 2011 through 2015. They will use the same methodology as before, to gather information about the inventory of housing data and service data.

The CPMP *needs.xls* documents the status of homeless individuals and families in accord with the annual 'point-in-time' survey and details the choice of priority needs and allocation priorities based on acceptable HUD standards.

The Continuum of Care application articulates its homeless and homeless prevention strategies, based on the data collected, its consultation with homeless assistance providers, homeless persons and other organizations collecting and analyzing relevant information. These strategies include the ongoing development and maintenance of a funnel-shaped continuum, beginning with outreach and assessment efforts, aimed at identifying homeless in the community and assessing their needs; connecting them to their most urgent shelter and service needs; assisting them to transition from emergency shelter to transitional, permanent supportive or independent housing; and aggressively pursuing methods and strategies to prevent homelessness-both for the chronic homeless and for those at risk of homelessness.

2. Chronically Homeless Persons

In addressing the needs of the chronically homeless, there is a multi-pronged approach; prevention, aggressive outreach, assessment and case management, mainstreaming benefits and resources and housing. Housing must be linked to stabilization and community-based services that will ensure successful tenancies. Permanent supportive housing is a high priority for the chronically homeless population.

Homeless Inventory (91.210 (c))

The jurisdiction shall provide a concise summary of the existing facilities and services (including a brief inventory) that assist homeless persons and families with children and subpopulations identified in Table 1A. These include outreach and assessment, emergency shelters and services, transitional housing, permanent supportive housing, access to permanent housing, and activities to prevent low-income individuals and families with children (especially extremely low-income) from becoming homeless. The jurisdiction can use the optional Continuum of Care Housing Activity Chart and Service Activity Chart to meet this requirement.

3-5 Year Strategic Plan Homeless Inventory response:

Summary of Existing Facilities and Services

A summary of the existing facilities and services that assist homeless persons and families with children and the subpopulations are provided in the homeless tab in the CPMP *needs.xls*.

Homeless Strategic Plan (91.215 (c))

1.Homelessness— Describe the jurisdiction's strategy for developing a system to address homelessness and the priority needs of homeless persons and families (including the subpopulations identified in the needs section). The jurisdiction's strategy must consider the housing and supportive services needed in each stage of the process which includes preventing homelessness, outreach/assessment, emergency shelters and services, transitional housing, and helping homeless persons (especially any persons that are chronically homeless) make the transition to permanent housing and independent living. The jurisdiction must also describe its strategy for helping extremely low- and low-income individuals and families who are at imminent risk of becoming homeless.

2.Chronic homelessness—Describe the jurisdiction's strategy for eliminating chronic homelessness by 2012. This should include the strategy for helping homeless persons make the transition to permanent housing and independent living. This strategy should, to the maximum extent feasible, be coordinated with the strategy presented Exhibit 1 of the Continuum of Care (CoC) application and any other strategy or plan to eliminate chronic homelessness. Also describe, in a narrative, relationships and efforts to coordinate the Conplan, CoC, and any other strategy or plan to address chronic homelessness.

3.Homelessness Prevention—Describe the jurisdiction's strategy to help prevent homelessness for individuals and families with children who are at imminent risk of becoming homeless.

4.Institutional Structure—Briefly describe the institutional structure, including private industry, non-profit organizations, and public institutions, through which the jurisdiction will carry out its homelessness strategy.

5.Discharge Coordination Policy—Every jurisdiction receiving McKinney-Vento Homeless Assistance Act Emergency Shelter Grant (ESG), Supportive Housing, Shelter Plus Care, or Section 8 SRO Program funds must develop and implement a Discharge Coordination Policy, to the maximum extent practicable. Such a policy should include "policies and protocols for the discharge of persons from publicly funded institutions or systems of care (such as health care facilities, foster care or other youth facilities, or correction programs and institutions) in order to prevent such discharge from immediately resulting in homelessness for such persons." The jurisdiction should describe its planned activities to implement a cohesive, community-wide Discharge Coordination Policy, and how the community will move toward such a policy.

1. Homelessness

The ultimate goal in providing shelter for homeless households is to maximize those who are able to secure and maintain themselves in permanent housing. There are approximately XXX (COC to confirm after 4-27-10 meeting) transitional housing units in the GNCOC area. The members of the GNCOC recognize that emergency shelter and transitional housing do not meet the needs of our City's homeless individuals and families. The GNCOC is putting all of their planning efforts into permanent supportive housing and estimate the need for 204 more beds in the next 5 years. However, the GNCOC continues to increase access to affordable permanent housing by making certain that service providers have access to information regarding available

permanent units and/or subsidies to make these units affordable. The GNCOC's work in expanding community-based services increase the opportunities for people to feel comfortable making that change to permanent housing, knowing that there will be necessary supports available, should they need them. The *Greater Nashua 10 Year Plan to End Homelessness* set the following goals:

Goal One: Prevent Homelessness Whenever Possible

The most economical and humane strategy for addressing homelessness for those at imminent risk is to prevent it in the first place. Providing one-time or short-term rent or mortgage subsidies, legal assistance, and housing placement services are critical in order to reduce the high cost of providing services care and to eliminate the disruption that results when people become homeless.

Goal Two: Re-House People When Homelessness Cannot be Prevented

When it is not possible to prevent individuals and families from becoming homeless, the next goal is to re-house those individuals and families as quickly as possible. Housing placement services is a critical step for the care and welfare of those experiencing homelessness.

Goal Three: Provide Wrap-Around Services that Promote Housing Stability and Self-Sufficiency

Once clients are in housing, a key strategy for addressing homelessness is allocating resources and providing support services to stabilize the housing environment and encourage households to maintain housing.

Specific strategies to achieve these goals can be found in the 10-Year Plan.

2. Chronic Homelessness

The strategies identified are central to the focus of addressing chronic homelessness. Chronically homeless individuals are likely to also suffer from the effects of substance abuse and/or mental illness. A national homeless study conducted by the National Coalition for the Homeless indicated that 25% of the homeless suffer from mental illness and that 60 % of homeless individuals are drug dependent.

A cornerstone in the eradication of chronic homelessness is the provision of permanent supportive housing. For long term success, the GNCOC realizes that it must expand the base and increase the capacity of current homeless housing providers to create and operate housing for this population. The second way to achieve success is to engage the larger affordable housing community to incorporate chronically homeless housing in their own housing plans. Finally, increases in rental subsidies that are teamed with supportive services are a priority. The GNCOC published a "Toolkit" which provides resources and guidance to those at risk of becoming homeless. The *Toolkit* includes a crisis services map, apartment search information, clothing and household items list, food resources, food stamps, direction to financial resources, legal assistance and other items. There are 42 agencies listed in the *Toolkit* who provide support services to homeless and those at risk of homelessness.

3. Homelessness Prevention

The breadth of the population dealing with the potential of homelessness has grown. Agencies throughout the area have seen an increase in those with long-term work histories at significant risk of losing their housing, due to unemployment and underemployment. There has also been an increase in family homelessness. Food pantries note an increase in those using their resources. An increasing number of

households have been at risk of foreclosure, either as part of the sub-prime loan crisis or due to economic hardship. Nashua currently has a 12% foreclosure rate.

4. Institutional Structure for Homelessness

The primary decision-making group is the GNCOC, whose mission is threefold: (1) To foster and promote comprehensive, cohesive, and coordinated approaches to housing and community resources for homeless persons and families; (2) To identify and address service gaps and risk factors in the community; and (3) To prioritize unmet service needs to develop and oversee a system of prevention, intervention, outreach assessment, direct care and aftercare for homeless individuals and families coordinates. The GNCOC identifies the following agencies that will assist in carrying out the homeless strategy:

Non-Profit Organizations

Adult Learning Center	Nashua Pastoral Care Center
Big Brother/Big Sister	Nashua Red Cross
Bonnie CLAC	Nashua Soup Kitchen & Shelter
Boys & Girls Club	National Alliance on Mental Illness
Bridges	Neighborhood Housing Services of Greater Nashua
Caregivers	New Hampshire Catholic Charities
Community Council of Nashua	New Hampshire Coalition to End Homelessness
Corpus Christi Emergency Assistance Resources	New Hampshire Legal Assistance
Gateway Community Services	Norwell Home
Greater Nashua Interfaith Hospitality Network	Salvation Army
Harbor Homes	Share (Milford)
Keystone Hall	Southern New Hampshire HIV/AIDS Task Force
Lamprey Health Center	Southern NH Medical Center Access Team
LinkAbilities	Southern NH Rescue Mission
Manchester Veteran's Home	Southern NH Services Homeless Outreach
Marguerite's Place	St. John Neumann Church
Mary's House	St. Joseph Hospital
Nashua Advocacy Group	Tolles Street Mission
Nashua Children's Home	United Way of Greater Nashua
	Youth Council

Public Organizations

Child and Family Services	NH Housing Finance Authority
City of Nashua, Division of Health and Human Services	State of NH, Service Link
City of Nashua, Mediation Program	State of NH Department of Employment Security
City of Nashua, Police Department	State of NH Department of Health and Human Services
City of Nashua, Public Library	State of NH, House of Representatives
City of Nashua, School Department	Town of Merrimack, Welfare
City of Nashua, Urban Programs	Town of Milford, Welfare
City of Nashua, Welfare Department	U.S. Department of Housing and Urban Development, Manchester field office
Congressman Hodes Office	Veteran's Administration
Nashua Housing Authority	

Private Industry

Greater Nashua Chamber of Commerce	Merrimack County Savings Bank
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5. Discharge Coordination Policy

The Continuum of Care which serves the homeless in the area, has adopted formal discharge protocols for facilities discharging people from foster care, health care, mental health care and correctional facilities. Information provided by the GNCOC from their 2009 SuperNOFA application states the following:

Foster Care: Future planning for children 16 and older (or younger if in state guardianship) includes: adult living preparation, educational and career planning, employment options, vocational training programs, adult connections and/or mentors, family supports, medical coverage, and adult housing options or alternatives that are safe and affordable. According to the Bureau of Homeless and Housing Services (BHHS), shelters and McKinney-Vento funded transitional and permanent housing programs are not appropriate housing for this population. DCYF Aftercare Services is a voluntary program that provides continued planning and support for eligible young adults between the ages of 18-21 formerly in DCYF/DJJS foster care. This program offers a range of supports and services designed to assist young adults in reaching their educational, employment and personal goals including limited services and funds for housing and related expenses. This Discharge Planning Protocol is understood and agreed to by the BOS and the systems of care in the CoC.

Health Care: A revised Homeless Prevention Discharge Plan was adopted by both the Discharge Planning Committee and the DHHS Commissioner in March 2007. Members from various health care providers were represented. A protocol was established as part of the plan that calls for health care providers to communicate with homeless outreach services and housing resources and to provide human services resource packets for distribution to patients who are homeless upon admission and/or identified as at risk of homelessness upon discharge. According to the Bureau of Homeless and Housing Services (BHHS), shelters and McKinney-Vento funded transitional and permanent housing programs are not appropriate housing for this population. This Discharge Planning Protocol is understood and agreed to by the BOS and the institutions and systems of care in the CoC.

Mental Health: Development of an individualized discharge plan is initiated by the assigned treatment team upon admission and modified to reflect new data throughout the treatment planning process. The patient/legal guardian, family and significant others, as well as relevant outpatient providers, are included in the development and implementation of the discharge plan. It is designed to facilitate a smooth transition of the patient from the Hospital to home, community or other facility in a manner that will minimize delays in discharge and offer a continuum of care between the Hospital and anticipated care providers. Discharge planning shall be conducted in accordance with all federal, state and regulatory requirements. The discharge plan shall address the patient's housing preferences, level of care needs, accessibility to services and affordability. Discharge to homeless shelters, motels and other non-permanent settings shall be avoided to the maximum extent practicable. According to the Bureau of Homeless and Housing Services (BHHS), shelters and McKinney-Vento funded transitional and permanent housing programs are not appropriate housing for this population. The Administrator, Community Integration, under the direction of the Medical Director, oversees this process. This Discharge Planning Protocol is understood and agreed to by the BOS and the institutions and systems of care in the CoC.

Corrections: The Department of Corrections has a formal protocol in place for parolees. The protocol includes inmates developing a formal discharge/parole plan, residing in an on-site transitional housing facility and accessing Department Halfway Houses upon release. DHHS has entered into a Memorandum of Agreement with the Department of Corrections regarding Medicaid eligibility determination at least 90 days prior to an inmate's release. According to the Bureau of Homeless and Housing Services (BHHS), shelters and McKinney-Vento funded transitional and permanent housing programs are not appropriate housing for this population. This Discharge Planning Protocol is understood and agreed to by the BOS and the institutions and systems of care in the CoC.

COMMUNITY DEVELOPMENT

Community Development (91.215 (e))

*Please also refer to the Community Development Table in the Needs.xls workbook

1. Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), – i.e., public facilities, public improvements, public services and economic development.
2. Describe the basis for assigning the priority given to each category of priority needs.
3. Identify any obstacles to meeting underserved needs.
4. Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.

NOTE: Each specific objective developed to address a priority need, must be identified by number and contain proposed accomplishments, the time period (i.e., one, two, three, or more years), and annual program year numeric goals the jurisdiction hopes to achieve in quantitative terms, or in other measurable terms as identified and defined by the jurisdiction.

3-5 Year Strategic Plan Community Development response:

1. Non-Housing Community Development Needs

Although HUD's Consolidated Plan format requires significant analysis related to housing and homelessness, non-housing community development needs are a high priority to the City. Activities which help to cultivate economic opportunities through participation in the creative economy, improve the quality of life in the neighborhoods and make Nashua a desirable place to live are highlighted throughout this Plan. With these conceptual goals in mind, the City of Nashua anticipates using CDBG funding to support programs to:

1. Provide training, education, and employment opportunities to help expand Nashua's workforce, particularly by lifting low-income and moderate-income residents into stronger positions in the evolving economy. Particular emphasis will be placed on programs that cultivate entrepreneurship and microenterprise as well as those that create opportunities for larger-scale job creation through site

assembly, environmental remediation, historic preservation, building rehabilitation, infrastructure development, technical assistance, and assistance to businesses.

2. Strengthen, preserve, and enhance the physical character of and quality of life in Nashua's neighborhoods, including the housing stock, and the public infrastructure and facilities, with particular emphasis on the low-income and moderate-income neighborhoods, designated NRSA (upon HUD approval), and those areas that benefit all residents of this primarily low-income and moderate income City. Priorities will be placed on projects that improve streets and transportation infrastructure, install sidewalks and provide for pedestrian safety, redevelop parks, plant trees, and create new parking facilities in these neighborhoods. In addition, code enforcement for existing residential buildings will be emphasized, so deteriorating properties do not have a detrimental influence on the neighborhoods. Finally, homeownership programs will be supported to help improve community stability by increasing homeownership rates in Nashua.
3. Continue to build the capacity of residents to empower themselves to help strengthen their community, address problems, and develop pride in their City. Public service activities that strengthen neighborhood organizations, provide employment, skills, and homebuyer training, and offer leadership opportunities to youth will be emphasized.

Neighborhood Impact Initiative

Consistent with these priorities, the City of Nashua is launching a Neighborhood Impact Initiative to target resources in areas where more than 51% of residents are low or moderate-income and where significant deterioration has led to limited private investment and declining property values. This comprehensive program will help stabilize and revitalize neighborhoods through the concentrated investment of staff and financial resources from all City departments. Activities will include improvements to neighborhood facilities, parks, and infrastructure through the Division of Public Works, enhanced inspections by officials from the Code and Building Departments, coordinated actions by public safety departments, and significant capital investment to enhance the appearance of the targeted area. Similar to the goals of HUD-designated Neighborhood Revitalization Strategy Areas (NRSAs), the City will concentrate resources in target areas, in the hopes of maximizing the value and impact of its actions and expenditures. Consistent with the Master Plan, particular focus will be paid to the commercial centers and public squares within CDBG-eligible neighborhoods, where impacts will be felt by the broadest possible cross-section of neighborhood residents. The program will be seeded with CDBG funds, along with portions of other funding including City general funds for streets and sidewalk improvements, housing rehabilitation and lead hazard control funding, economic development incentives, and grant-funded policing initiatives.

2. Basis for Assigning Priorities

The priorities for individual Community Development needs identified in this plan are derived from the input obtained from numerous outreach efforts, surveys, and consultations used to identify community needs and establish this Consolidated Plan's priorities. Prioritization also takes into consideration feasibility of projects, impact of the costs of larger projects on other priorities, the anticipated funding levels for the CDBG program, and other sources of funding that may be available to address established needs.

Activities which are labeled as "High" priorities in the tables below and elsewhere in this plan are those which will receive Consolidated Plan funding from the City's formula grants over the next five years. Activities which are identified as "Medium" priorities are those which will likely receive Consolidated Plan funding if the applicable formula grants to the City of Nashua are increased during the next five years and may also receive funds if particularly strong projects are identified. Activities that receive a "Low" priority will only receive Consolidated Plan funding over the next five years if there are no "high" or "medium" activities identified. A "Low" rating does not necessarily diminish the importance of these activities or indicate that there is no need for them in Nashua. Many activities that are assigned a "Low" priority for CDBG funding are nevertheless important needs for the community or high priorities for other sources of funding. Some activities receive "Low" ratings if the funds that are potentially available under the Consolidated Plan programs would be insufficient to have a meaningful impact on these needs or adequately funding them would result in minimal output or outcome accomplishments relative to the amount of funds expended at the expense of other priority programs.

The chart below, titled "Priority Community Development Activities" (consistent with Table 2B) summarizes the City's general non-housing community development priorities. The chart is a HUD-produced list of all non-housing community development activities that are potentially eligible for CDBG funding. It is extremely difficult to quantify and determine the cost of the unmet need for most of these activities. Also, the City utilizes other resources (City Capital or General Revenue) to fund many of these activities such as sidewalks, tree planting, fire stations, public services, etc. We have not attempted to determine the scope of the unmet need or to determine how much it would cost to fund the unmet need. In all cases, the unmet need for these services and activities greatly exceeds the available resources.

Table 2B
Priority Community Development Needs

Priority Need	Priority Need Level	Estimated 5 Year Goal
Clearance and Demolition	Medium	\$ 40,308.00
Clearance of Contaminated Sites	Medium	\$ 80,616.00
Public Facilities (General)		\$ 604,625.00
Senior Centers	Low	
Handicapped Centers	Medium	
Homeless Facilities	Medium	
Youth Centers	High	
Neighborhood Facilities	Medium	
Health Facilities	High	
Parks and/or Recreation Facilities	High	
Non-Residential Historic Preservation	Low	
Infrastructure (General)		\$ 806,166.00
Street Improvements	Medium	
Sidewalks	Medium	
Public Services (General)		\$ 604,625.00

Youth Services	High	
Substance Abuse Services	Medium	
Health Services	High	
Tenant Landlord Counseling	High	
Economic Development (General)		\$ 725,550.00
C/I Land Acquisition/Disposition	Medium	
C/I Infrastructure Development	Medium	
C/I Building Acquisition/Const/Rehab	Medium	
ED Assistance to For-Profit	High	
ED Technical Assistance	High	
Micro-enterprise Assistance	High	

3. Obstacles to Meeting Underserved Needs

The primary obstacle to meeting the City of Nashua's non-housing community development needs is funding. The lack of available funds severely limits the levels of accomplishment that are possible and in many cases forces difficult choices among priorities.

Economic Development activities are often measured in terms of job creation. Meeting the City's employment needs is particularly difficult given that current state of the economy. The importance of supporting existing businesses and cultivating a climate that is favorable to business becomes a priority. As a result, employment opportunities will exist for low and moderate income individuals.

4. Long Term and Short Term Goals

All proposed and projected accomplishments throughout this plan are five-year goals based on the presumption of a certain level of annual funding and are subject to the availability of funds. The totals listed do not necessarily reflect unique persons served since many activities will continue to serve ongoing needs of the same individuals for more than one program year. Accomplishments may change if funding is reduced or increased during the five year planning period. The objectives noted below are non-housing community development needs.

Economic Opportunities

The City plans to cultivate economic opportunities, improve the quality of life in neighborhoods, and promote a vibrant and sustainable economy, particularly for residents and businesses in low and moderate income areas of the community. With these goals in mind, the City of Nashua anticipates using CDBG and other funding sources to support programs to:

- Provide technical assistance to businesses, including Best Retail Practices, and a workshop series designed to stimulate the growth of new enterprises and strengthen existing businesses to encourage job creation and retention.
- Cultivate entrepreneurship and microenterprise development, including technical assistance and micro-credit loan capital.

- Increase the City's value through infrastructure investment, including Downtown Nashua and LMI neighborhoods. Major economic development plans include the Broad Street Parkway and the Riverwalk. Priorities will be placed on facades, streetscape and sidewalk improvements, traffic calming measures, and pedestrian-scale lighting promoting pedestrian safety. Beautification efforts will include tree planting. Neighborhood impact teams will also be utilized.
- Target, assess, and undertake redevelopment efforts to clean-up contaminated sites, and abandoned/underutilized property.
- Continue to promote a vibrant and sustainable economy that will empower and promote the self-sufficiency of low and moderate income individuals.

The following table summarizes the City of Nashua's priority economic development needs:

Obj #	Specific Objectives	Performance Indicators	Five-Year Goal
EO-1.1	Improve the economic well being of Nashua's LMI individuals through job creation & retention	# of jobs created or retained	60
EO-1.2	Stimulate the growth of new enterprises, including micro-enterprises	# of businesses assisted	50
EO-1.3	Reclaim brownfields and other abandoned or underutilized sites	# of sites remediated or redeveloped	10
EO-1.4	Enhance job skills of LMI individuals	# of individuals trained	150
EO-3.1	Enhance the vitality of neighborhood business districts and Downtown Nashua	# of improvement projects	5

Local Infrastructure & Strengthening Neighborhoods

Over the next 5 years, these activities will serve to enhance and promote the historic and cultural character of Nashua's neighborhoods and provide a high quality of life for current and future generations. By enhancing the appearance, pedestrian amenities, and distinctiveness of its neighborhoods, Nashua will foster a sense of solidarity and pride among residents, thereby strengthening community bonds, reducing behaviors such as crime and littering, and encourage residents to become involved in protecting the character of their neighborhoods. Stronger neighborhoods will also result in higher and more stable property values, fewer abandoned and derelict buildings, and a reduction in property tax delinquency.

Obj #	Specific Objectives	Performance Indicators	Five-Year Goal
SL-3.1	Enhance the character of existing neighborhoods and revitalize older ones	# of neighborhood projects	3
SL-3.2	Improve quality of life issues contributing to neighborhood blight	# of properties addressed on a spot basis	3

SL-3.3	Improve the quality/increase of public improvements that benefit LMI individuals	# of infrastructure projects completed	5
SL-3.4	Provide LMI residents with accessible open space, from neighborhood playgrounds to large scale regional parks	# of parks/green space projects completed	10
SL-3.5	Ensure neighborhoods have access to schools, community centers and open space via sidewalks or trails	# of sidewalk, parking, trail, etc projects completed	5

Community Facilities and Public Services

The primary goal of these activities is the empowerment of low-income and moderate income residents. These activities provide residents with skills, stability, and core resources to help clients develop self-sufficiency and independence. Participants in these programs will be better able to complete education, obtain and retain employment, purchase or rent permanent housing and meet basic needs improving their overall quality of life. Some activities are also aimed at improving the capacity and capabilities of neighborhood associations and other organizations. While these activities will measure their outcomes by the accomplishments of the clients served, their success may not be reflected in overall statistics for the community as new immigrants and others move in with similar needs. The totals listed do not necessarily reflect unique persons served since many activities will continue to serve ongoing needs of the same individuals for more than one program year.

Obj #	Specific Objectives	Performance Indicators	Five-Year Goal
SL-1.1	Improve the quality/increase the quantity of facilities that serve LMI individuals	# of public facilities built or rehabilitated	25
SL-1.2	Improve the quality/increase the quantity of facilities that benefit LMI teens/youth	# of public facilities dedicated to youth built or rehabilitated	20
SL-1.3	Improve services for all LMI individuals	# of individuals served	25,000
SL-1.4	Improve services for LMI youth & teens	# of youth participating in programs	10,000

Antipoverty Strategy (91.215 (h))

1. Describe the jurisdiction's goals, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually). In consultation with other appropriate public and private agencies, (i.e. TANF agency) state how the jurisdiction's goals, programs, and policies for producing and preserving affordable housing set forth in the housing component of the consolidated plan will be coordinated with other programs and services for which the jurisdiction is responsible.

2. Identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the jurisdiction has control.

3-5 Year Strategic Plan Antipoverty Strategy response:

Most activities undertaken by the City with CDBG and other federal and state funds for low income families are efforts to reduce persons in poverty and improve the quality of life for Nashua residents, either directly or indirectly. Staff also works in partnership with citizens, other City departments and the public and private sectors to accomplish its goal of reducing poverty.

CDBG programs which directly influence the household income level include: job training, job counseling and placement, education and business development. In the near future and possibly for the next five years, the focus will be on job development and economic stabilization.

CDBG programs that may indirectly influence the impact of household living by those at or below the poverty level, by reducing other costs include, affordable housing, energy efficiency, public transportation and health care assistance.

In the near future and possibly for the next five years the City will be funding the following indirect activities:

- Revitalization and economic development activities
- Housing rehabilitation including energy efficiency improvements
- Transportation assistance
- Health services – both physical and mental

In so far as most households being provided housing assistance end up with a reduced level of cost, they are more able to allocate their scarce resources to other needs such as nutrition, education and other activities which can help lead them out of poverty.

NON-HOMELESS SPECIAL NEEDS

Specific Special Needs Objectives (91.215)

1. Describe the priorities and specific objectives the jurisdiction hopes to achieve over a specified time period.

2. Describe how Federal, State, and local public and private sector resources that are reasonably expected to be available will be used to address identified needs for the period covered by the strategic plan.

3-5 Year Non-homeless Special Needs Analysis response:

1. Priorities and Objectives of Non-Homeless Special Needs

Throughout the City, there are households in various subpopulations who are not homeless but have specific housing needs and may also require special attention due to their current or prospective service needs. These subpopulations include: elderly, frail elderly, persons with severe mental illness, victims of domestic violence,

developmentally disabled, physically disabled, substance abusers, and persons with HIV/AIDS.

The city is aware of the needs of special populations and is committed to supporting initiatives which target these populations. As part of its strategy, through its rehabilitation programs, the City has provided assistance to a variety of programs that provide shelter and support services to low income households, who also may either health issues, substance abuse and/or mental health concerns are victims of domestic violence or are physically or developmentally disabled.

2. How Funds will be used to Address Identified Needs

The approach to addressing the needs posed by these populations has changed over the past twenty years. In response, a variety of public and private sector resources are available to address some of the current approaches to housing and service needs for these groups. These resources are limited and insufficient to meet all the needs identified. The members of these subpopulations frequently require assistance from multiple sources in order to succeed in daily life.

In addition to the availability of federal public housing and other federally assisted housing programs for the elderly (primarily Section 202) and for the disabled, there are affordable elderly developments, both congregate and independent, financed by the NH Housing Finance Authority at the State level. The City is also serviced by the Nashua Housing Authority and private non-profits who support the elderly. Programs implemented to meet the needs of elderly residents include subsidized housing; adult day care; home care; congregate housing; nutrition; guardianship; legal services; transportation; assistance with health care and financial issues; social activities and coordination services for the disabled elderly.

The number of adults with mental illness or developmental disabilities, who are treated in institutions, has continued its dramatic decline. Correspondingly, the number receiving community-based services has significantly increased. Non-profits are the primary service systems for providing services and housing (through the use of state and private funding), to these populations.

At the level of local government, the City has a Public Housing Authority, non-profit agencies and City departments, all which concentrate at least some of their services on these populations, utilizing funds from various private, state and federal sources. HOME funds can be used for providing assistance in the acquisition, development and rehabilitation of supported housing. In addition, local and regional non-profit organizations, typically administer programs targeted to these populations, some of which are funded through the state agencies listed above and others which are funded with federal resources or through public and private grants or a combination of these sources.

The City of Nashua is not a formula grantee for the HOPWA (Housing Opportunities for Person with AIDS) Program; therefore it is not a required submission of this Consolidated Plan. However, the City of Nashua is the recipient of a 2009 \$1,430,000 Tenant Based Rental Assistance HOPWA (Housing Opportunities for Person with AIDS) competitive grant, with the sponsors being the Southern NH HIV/AIDS Task Force and Harbor Homes, Inc. The HOPWA Competitive Program is a national competition to select model projects or programs that address the specific needs of persons living with HIV/AIDS and their families in innovative ways. Since 2001, Appropriations Acts have required that priority be given to the renewal of expiring competitive grants that

have successfully undertaken permanent supportive housing projects. Over a three year period the grant program will provide long-term rental subsidies and supportive services for 31 low-income individuals and families living with HIV/AIDS in Greater Nashua. Additionally, Harbor Homes, Inc. is the recipient, with the Southern NH HIV/AIDS Task Force as the sponsor for a Short Term Rent, Mortgage and Utility HOPWA grant. This program provides \$500,457 per three years to provide emergency financial assistance to prevent eviction, foreclosures and utility disconnect, as well as supportive services for low-income individuals and families with HIV/AIDS residing in Greater Nashua.

Non-homeless Special Needs (91.205 (d) and 91.210 (d)) Analysis (including HOPWA)

*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

1. Estimate, to the extent practicable, the number of persons in various subpopulations that are not homeless but may require housing or supportive services, including the elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction, victims of domestic violence, and any other categories the jurisdiction may specify and describe their supportive housing needs. The jurisdiction can use the Non-Homeless Special Needs Table (formerly Table 1B) of their Consolidated Plan to help identify these needs.

*Note: HOPWA recipients must identify the size and characteristics of the population with HIV/AIDS and their families that will be served in the metropolitan area.

2. Identify the priority housing and supportive service needs of persons who are not homeless but may or may not require supportive housing, i.e., elderly, frail elderly, persons with disabilities (mental, physical, developmental, persons with HIV/AIDS and their families), persons with alcohol or other drug addiction by using the Non-homeless Special Needs Table.

3. Describe the basis for assigning the priority given to each category of priority needs.

4. Identify any obstacles to meeting underserved needs.

5. To the extent information is available, describe the facilities and services that assist persons who are not homeless but require supportive housing, and programs for ensuring that persons returning from mental and physical health institutions receive appropriate supportive housing.

6. If the jurisdiction plans to use HOME or other tenant based rental assistance to assist one or more of these subpopulations, it must justify the need for such assistance in the plan.

3-5 Year Non-homeless Special Needs Analysis response:

1. Estimated Number of Persons Requiring Supportive Services

See the Needs.xls Table in the CPMP. In summary, these tables indicate a significant need for housing and a significant need for supportive services.

2. Priority Housing and Supportive Services

The chart below (consistent with HUD Table 1B) outlines the estimated populations of persons in various identified categories who may have special needs for housing and supportive services in Nashua. The Non-Homeless Special Needs Table elsewhere in this document provides additional information.

Special Needs (Non-Homeless Populations)
Housing & Supportive Services
(Consistent with Table 1B)

Category	Estimated # of individuals with Housing & SS Needs	Priority Level
Elderly	1,690	HIGH
Frail Elderly	1,435	MEDIUM
Sever Mental Illness		MEDIUM
Developmentally disabled		MEDIUM
Physically Disabled	1,070	MEDIUM
Alcohol/Drug Addictions		MEDIUM
HIV/AIDS		LOW

*Source 2009 CHAS data, COC, State of NH

3. Basis for Assigning Priority

The priorities above are a reflection of housing market conditions, a strong desire to increase the homeownership rate in the City of Nashua, the GNCOC's 10-Year Plan to End Homelessness, and the relative severity of needs. Priority needs with low or medium levels shall not be interpreted to diminish the importance of assisting these populations. Rather, the priority level is a reflection of how CDBG and HOME funds will be used to address the issues. In most cases, a low or medium priority level is an indication that other agencies are targeting their resources to the issues.

4. Obstacles to Meeting Underserved Needs

Adequately serving the needs of elderly and frail elderly is a substantial challenge. Affordability is an issue for both owners and renters. Based on market rents, there are a limited number of apartments available for households at less than 80% of area median income. Many elderly homeowners are on fixed incomes and, although the asset value of their homes may be significant, they are unable to make necessary repairs, pay utilities or taxes. In addition, their housing is no longer appropriate for an aging household. Availability of supportive services is increasingly limited, both in scope and in the population served. In Nashua, as in the surrounding communities, transportation is noted as a problem. The demand for transportation, in terms of frequency and locations served, is greater than the programs can meet. Transport to medical appointments is a critical problem. Assistance in navigating the health benefits network is a significant need that has increased with changes in the Medicare program.

Disabled households, including the physically disabled, developmentally disabled and those with mental health challenges face many obstacles in their efforts to access adequate housing and supportive services. Affordability is a key barrier, since the majority of these households are low and very low income. Their dependence on rental assistance and its limited availability exacerbates this problem. Availability of accessible housing units poses a further challenge. The stigma attached to a range of disabilities also impacts the ability of this population to secure housing in locations which are safe and convenient to the services that are required. As more of these individuals continue to be mainstreamed into the community, the services themselves have continued to be reduced because of funding cutbacks and are inadequate to meet the needs of this population.

5. Supportive Housing Facilities and Services

There are a variety of governmental and non-profit agencies which service the housing and supportive needs of the non-homeless populations described above. The table below, consistent with Table 1B lists many of the area resources. While not comprehensive, this table demonstrates there is capacity in the City to address populations with special needs. Additionally, agencies listed may be supported with funds other than CDBG and HOME.

Supportive Services and Programs
Consistent with Table 1B

POPULATION	AGENCY	SERVICE
Elderly & Frail Elderly	Caregivers Inc. Home Health and Hospice Care Senior Companion Program St. Joseph Home and Hospice Care Healthy At Home Inc. Interim Health Care Life Coping Easter Seals New Hampshire NH Division of Elderly and Adult Services Gateways Community Services	In-Home health and non-health services, advocacy, case management, support services
	Service Link of Greater Nashua	Referral Network
	New Hampshire Legal Assistance	Legal Services
	St. Joseph Community Services	Food Services
	Nashua Senior Center	Recreation and educational services
	Retired Senior Volunteer Program (RSVP)	Volunteer opportunities for seniors
	Nashua Center for Healthy Aging	Physical therapy, prescription assistance
	NH Housing Finance Authority Neighborhood Housing Services of Greater Nashua	Housing

	Nashua Housing Authority	
	Refurbished Equipment Marketplace	Medical equipment
	Camp Allen	Recreation services
	Crotched Mountain Foundation	Therapy, medical equipment, residential and outpatient services
Disabled Persons (Physically and Developmentally)	Granite State Independent living Foundation	Support services, advocacy, case management, independent living assistance
	Greater Nashua Mental Health Center at Community Council	
	Disabilities Rights Center	
	Nashua Center for the Multiply Handicapped	
	Service Link of Greater Nashua	
	Gateways Community Services	
	New Hampshire Association for the Blind	
	New Hampshire Vocational Rehabilitation, Sight Services for Independent Living	
	The Friendship Club	
	New Hampshire Vocational Rehabilitation,	Employment assistance
	PLUS Company	
	Nashua Housing Authority	Housing
	NH Housing Finance Authority	
Mental Illness	The Youth Council	Counseling, individual and family advocacy, recovery
	Child and Family Services of New Hampshire	
	Greater Nashua Mental Health Center at Community Council	
	National Alliance on Mental Illness (NAMI)	
	Harbor Homes Inc.	Emergency and transitional housing
Alcohol/Drug Addicted	Key Stone Hall	Substance abuse treatment, support services, housing
	The Youth Council	
	Greater Nashua Mental Health Center at Community Council	
	Phoenix House	
	Phoenix Academy	
	Healthy Steps	
HIV/AIDS	Southern NH HIV/AIDS task force	Advocacy, support services, housing
	Harbor Homes Inc.	
Domestic Violence	Bridges	Domestic and sexual violence counseling, support, housing
	Nashua Pastoral Care Center	
	Rape and Assault Support	

	Services New Hampshire Coalition Against Domestic and Sexual Violence	
All Special Needs Populations	Lamprey Health Center Southern NH Medical Center St. Joseph's Hospital	Health services
	Nashua Transit	Transportation
	Tolles Street Mission Nashua Soup Kitchen	Food programs

6. Use of HOME Funds to Address Special Housing Needs

Throughout this plan the use of HOME funds is stated where applicable.